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23 Attorneys for Plaintiffs

24 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

25 **COUNTY OF LOS ANGELES**

26 **PICO NEIGHBORHOOD ASSOCIATION and**  
27 **MARIA LOYA,**

28 Plaintiffs,

v.

**CITY OF SANTA MONICA, and DOES 1**  
through 100, inclusive,

Defendants.

**Case No.: BC616804**

**DECLARATION OF BARRETT S. LITT**  
**IN SUPPORT OF PLAINTIFFS' MOTION**  
**FOR AWARD OF ATTORNEYS' FEES**  
**AND EXPENSES**

Date: August 28, 2019

Time: 8:30 a.m.

Dept.: SSC-9

1 I, Barrett S. Litt, declare as follows:

2 1. I am an attorney duly licensed to practice law in the State of California and the United  
3 States District Court for the Central District of California. This declaration is submitted in  
4 support of Plaintiffs' Motion for Attorneys' Fees and Costs. The facts set forth herein are within  
5 my personal knowledge or knowledge gained from review of the pertinent documents. If called  
6 upon, I could and would testify competently thereto.

7 **I. BACKGROUND AND CIVIL RIGHTS/ATTORNEY FEE EXPERTISE**

8 2. Since 1984, I have been the principal or senior partner in firms that operate for the  
9 specific purpose of developing and maintaining a civil rights and public interest law practice that  
10 operates in the private sector on the basis of self-generated fee awards and other recoveries.  
11 Since January 1, 2013, I have been a partner in the law firm of Kaye, McLane, Bednarski & Litt  
12 (referred to at times as "KMBL"). Between September 2010 and December 31, 2012, I was a  
13 partner in the law firm of Litt, Estuar, and Kitson, which still operates to some extent as an  
14 independent firm to complete certain old cases. From July 2004 to September 2010, I was a  
15 partner in the law firm of Litt, Estuar, Harrison, and Kitson. From 1998 to July 2004, I was the  
16 principal in the law firm of Litt & Associates, Inc. From September 1, 1991 to May 1, 1997,  
17 when my then partner left the law firm to become Deputy General Counsel for Civil Rights at the  
18 federal Department of Housing and Urban Development, I was a partner at the firm of Litt &  
19 Marquez. For the seven years prior to that, I was a partner in the firm of Litt & Stormer, Inc.

20 3. I graduated from the University of California at Berkeley in 1966 and from UCLA  
21 School of Law in 1969. For the first approximately ten years of my practice, I focused primarily  
22 in the area of criminal defense at the trial and appellate levels, mostly in federal courts. In that  
23 capacity, I handled hundreds of matters, tried many cases ranging from immigration offenses to  
24 murders, and handled numerous appeals. Since 1981, I have focused primarily on complex civil  
25 litigation in the areas of constitutional law, civil rights law, class action litigation, and complex  
26 multi-party litigation.

27 4. My former firm, Litt & Stormer, received the Pro Bono Firm of the Year Award from  
28 Public Counsel in 1987 in recognition of its public interest and civil rights work. Litt & Marquez

1 received an award from the NAACP Legal Defense Fund in July 1992, as civil rights firm of the  
2 year in recognition of its civil rights work. I received an award from UCLA School of Law as its  
3 public interest alumnus of the year in 1995 and received a CLAY award for my work in  
4 *Goldstein v. City of Long Beach et al.*, along with my co-counsel in the case, described in ¶ 12  
5 *infra*.

6 5. I have both spoken and written on the subject of civil rights training. I published an  
7 article entitled "Class Certification in Police/Law Enforcement Cases" in Civil Rights Litigation  
8 and Attorney's Fee Annual Handbook, Vol. 18, Ch. 3 (West Publishing 2002) and one for the  
9 National Police Accountability Project titled "Select Substantive Issues Regarding Class Action  
10 Litigation In The Jail/Prison Setting", National Police Accountability Project, October 2006. I  
11 published an article in the Los Angeles Lawyer regarding the use of minimum statutory damages  
12 under the Unruh Act, particularly actions brought under Civil Code §52.1, to enhance the  
13 prospects for certifying class actions. See "Rights for Wrongs," Los Angeles Lawyer December  
14 2005. In 2010, I published an article in West's Civil Rights Litigation and Attorney's Fee Annual  
15 Handbook entitled, "Obtaining Class Attorney's Fees." I am rated "AV" by Martindale-Hubbell.  
16 I am, and have been for many years, listed in Super Lawyers Southern California in the fields of  
17 civil rights and class actions. I am listed in Best Lawyers in America.

18 6. My curriculum vitae is attached as Exhibit A to this declaration.

19 7. I am considered an expert in, among other things, attorneys' fees in civil rights and  
20 class action cases. I have frequently trained attorneys regarding obtaining and properly  
21 documenting statutory attorneys' fee awards. I have filed declarations on numerous occasions  
22 expressing expert opinions on the appropriate standards for awards of attorneys' fees in civil  
23 rights cases, which have been accepted by the courts.

24 8. In the State Bar proceeding *In re Yagman*, I was qualified as an expert in attorneys'  
25 fees under 42 U.S.C. §1988 and testified in person on whether or not Mr. Yagman's fee  
26 arrangement in a police shooting case was or was not unconscionable, as the State Bar contended  
27 in that case. I also recently testified in a State Bar proceeding as an expert on civil rights practice  
28 in the context of police and jail litigation.

1           9. In 2007, I testified as an attorneys' fee expert in a civil rights case on behalf of  
2 plaintiffs represented by a major law firm in Los Angeles. The case had a confidential  
3 settlement, with fees to be arbitrated by a former superior court judge now at JAMS. Because the  
4 settlement and arbitration were confidential, I do not feel at liberty to identify the issues, parties,  
5 firms or retired judge involved. However, there was a defense fee expert in that case who  
6 described me as "a prominent Los Angeles civil rights litigator experienced in fee issues arising  
7 from public interest litigation." The arbitrator described my testimony as "credible and reliable",  
8 and described me as having "had a wide exposure to fees at a number of major firms in Los  
9 Angeles doing complex civil litigation."

10           10. I have also on occasion represented other attorneys in their fee litigation seeking  
11 statutory attorneys' fees.

12           11. I litigate a wide range of civil rights cases, including police and jail abuse, wrongful  
13 conviction, housing and employment and other discrimination, and violation of a wide range of  
14 constitutional rights. My current emphases are civil rights class actions and wrongful convictions  
15 cases. I am currently lead or co-lead counsel in pending civil rights class actions in the Los  
16 Angeles area and in other jurisdictions, including Washington D.C., Maryland and Georgia.

17           12. As I mentioned, my full curriculum vitae is attached. To give some sense of my  
18 experience, I mention here the largest civil rights cases in which I have been the lead counsel and  
19 which have been resolved as of this writing:

- 20           ➤ *Williams v. Block*, Case No. CV97-03826 CW (C.D. Cal.) and related cases (a  
21 series of cases regarding county jail overdetention and strip searches, settled for  
22 \$27 Million and a complete revamp of jail procedure);
- 23           ➤ *Craft v. County of San Bernardino*, EDCV05-0359 SGL (C.D. Calif.) (reported at  
24 2008 U.S. Dist. LEXIS 27526) (certified class action against the Sheriff of San  
25 Bernardino County for blanket strip searches of detainees, arrestees, and persons  
26 ordered released from custody; partial summary judgment decided for plaintiffs;  
27 \$25.5 Million settlement plus injunctive relief in 2008);

- 1 ➤ *Craig Coley v. City of Simi Valley* (wrongful conviction case of man imprisoned  
2 for 39 years for crime he did not commit; settled pre-filing for \$21 Million; case  
3 handled jointly with Neufeld, Scheck & Brustin, who are based in New York);
- 4 ➤ *McClure v. City of Long Beach* (fair housing case against City of Long Beach for  
5 preventing six group homes for the handicapped from opening; jury verdict before  
6 remittitur of \$22.5 Million (exclusive of attorney's fees) rendered 8/04/04; case  
7 settled for \$20 Million);
- 8 ➤ *MIWON v. City of Los Angeles*, Case No.: CV07-3072 AHM (FMMx) (class  
9 action on behalf of demonstrators attacked by LAPD in MacArthur Park on May  
10 1, 2007; settled in 2009 for \$12.75 Million plus injunctive relief);
- 11 ➤ *Bynum v. District of Columbia*, Case No. 02-956 (RCL) (D.D.C.) (certified class  
12 action against the District of Columbia for overdetentions and strip searches of  
13 persons ordered released from custody, settled for \$12 Million in 2006);
- 14 ➤ *Nozzi v. Housing Authority of the City of Los Angeles*, Case No. CV 07-00380 PA  
15 (FFMx) (settlement of approximately \$9.4 Million for failing to provide proper  
16 mandated notice prior to subsidy reduction to Section 8 Housing Choice Voucher  
17 Program holders pending);
- 18 ➤ *O'Connell v. County of Los Angeles*, Case No. 13-CV-01905 MWF (PJWx) (\$15  
19 Million settlement in wrongful conviction case pending);
- 20 ➤ *Goldstein v. City of Long Beach, et al.*, Case No. CV04-9692 AHM (Ex) (C.D.  
21 Cal.) (wrongful conviction case against Long Beach Police Department based on  
22 violation of *Brady v. Maryland* for man imprisoned for 24 years; \$7.95 Million  
23 settlement in August 2010);
- 24 ➤ *Lopez v. Youngblood*, 609 F.Supp.2d 1125 ((E.D. Cal. 2009) (Settlement  
25 approved for putative class fund of approximately \$7 Million for inmates strip  
26 searched after becoming entitled to release, and strip searches in groups);
- 27 ➤ *Barnes v. District of Columbia*, Case 1:06-cv-00315-RCL 02-956 (RCL) (D.D.C.)  
28 (*Bynum* follow-up certified class action against the District of Columbia for

1 overdetections and strip searches of persons ordered released from custody,  
2 settled for \$6 Million in 2006).

3 13. This list does not include at least four pending class actions, two of which are currently  
4 in settlement negotiations and which I expect to resolve for eight figures, and two others of which  
5 are in earlier stages but will likely resolve in the eight figures if we are successful.

6 14. My qualifications have been noted by various courts or opposing experts. Following  
7 are a few examples:

8 a. Central District Judge Consuelo Marshall, in a fee decision in *Rodriguez et*  
9 *al. v. County of Los Angeles et al.*, CV 10-6342-CBM (AJWx) (12/27/2014), found that  
10 "Barrett S. Litt, who served predominantly in a consulting role on this case, is considered  
11 one of the leading civil rights attorneys in the country" and that the requested rate "of  
12 \$975 per hour for Attorney Litt is supported by his strong reputation and experience."

13 b. Kenneth Moscarel, a well-known defense fee auditor, recently stated in a  
14 declaration where he addressed my qualifications that I had "an outstanding background  
15 and reputation in civil rights/constitutional litigation in Los Angeles", that I was "one of  
16 the top litigators in [my] field" and that he believed that my "skill, experience, and  
17 reputation in his field are deserving of a premium rate" (although he thought a premium  
18 rate was lower than I do).

19 c. Magistrate Judge Carla Woehrlé, in awarding attorneys' fees in *Williams*  
20 *v. Block, supra*, commented that I am "considered one of the outstanding civil rights  
21 litigators in California, with special expertise in class actions, [and] the other attorneys  
22 involved in this litigation on behalf of the class are highly regarded, experienced and  
23 capable civil rights attorneys...."

24 d. United States District Judge Stephen Larson, in awarding attorneys' fees  
25 in *Craft v. County of San Bernardino, supra*, commented that "Plaintiffs' counsel are  
26 experienced civil rights litigators who are at the top of their field of expertise – civil  
27 rights litigation with special expertise in civil rights class actions."  
28



1           c.       In awarding attorneys' fees in *Gamino v. County of Ventura*, Case No.  
2       CV02-9785 CBM (Ex), the Court stated in 2005, "Mr. Litt is widely known as one of the  
3       foremost civil rights attorneys in California, having a particular expertise in civil rights  
4       class actions and other complex multi-party civil rights cases, especially law enforcement  
5       class actions."

6           f.       In *Molina v. Lexmark International Inc.*, LA Super. Ct. No. BC339177,  
7       Order Granting Plaintiff's Motion for Attorney's Fees and Costs in the Amount of  
8       \$5,772,008.07, filed Oct. 28, 2011 at 4., where I submitted a declaration in support of a  
9       fee motion, Judge Gregory W. Alarcon described another attorney and me as  
10      "acknowledged experts in attorney fees in class action cases . . . ."

11       15. As my case list demonstrates, I have been involved with, and successful in, a wide  
12      range of complex civil rights cases, and have regularly brought fee motions under numerous  
13      federal and state fee shifting provisions. I frequently provide fee declarations in support of fee  
14      applications by other attorneys in civil rights cases, which have been cited in fee orders in the  
15      Central District to support fees that are in line with those that counsel for the Plaintiffs are seeking  
16      in this case. See, e.g., *Rauda v. City of Los Angeles*, CV08-3128 CAS (PJW), Fee Order dated  
17      12/20/2010, p.10 ("With respect to the reasonableness of the fees requested, the Court finds that  
18      plaintiffs have sufficiently documented the fees requested. It further concludes, and is satisfied  
19      based on the declarations of Barrett S. Litt and Carol A. Sobel in support of plaintiffs' motion that  
20      the hourly rates requested by plaintiffs are consistent with those in the relevant legal community  
21      for individuals having the stature of plaintiffs' counsel."); *Lauderdale v. City of Long Beach*, No.  
22      CV 08-979 ABC (JWJx), Fee Order dated 1/11/2010, p.11 ("Barrett S. Litt, another experienced  
23      civil rights litigator, also testified that the rates are in line with the Southern California market, his  
24      own experience, and fee awards in similar cases.").

25       16. I regularly review a variety of material to keep abreast of rates charged and awarded  
26      for complex litigation in Southern California. I do this in several ways, including contacting firms  
27      to provide (on either a public or confidential basis) current rate information; speaking with other  
28      attorneys familiar with complex litigation rates; reviewing court filings and cases regarding

1 attorneys' fees (including both fee applications and fee awards); and obtaining other sources of fee  
2 information. In particular, I collect a wide variety of civil rights awards (either lodestar awards or  
3 lodestar crosschecks in civil rights class action fee awards) and class action awards in consumer  
4 cases with lodestar crosschecks, the results of which are described further on in this declaration.  
5 This has included review of rates sought and awarded to such boutique civil rights firms as my  
6 own firm(s); the ACLU; the Disability Rights Legal Center; Disability Rights Advocates; Public  
7 Counsel, Hadsell, Stormer et al.; the Law Offices of Carol Sobel; Schonbrun, DeSimone et al.; and  
8 awards to various individual civil rights practitioners. In addition, to the extent I am able, I collect  
9 information regarding commercial rates; there are periodically reported decisions addressing fee  
10 awards in commercial cases, which I periodically review; and I periodically review or collect rates  
11 from various large law corporate firms they have provided to courts or elsewhere.

## 12 II. SOURCE MATERIALS RELIED ON FOR RATE OPINIONS

13 17. The rate information on which I rely is set forth in full in Exhibit B to this Declaration,  
14 which is incorporated by this reference and is broken into three tables, described as follows:

- 15 ➤ Table 1: *Civil Rights Lodestar Awards/Lodestar Crosschecks*. These are taken  
16 from reported attorney fee awards, or filed court orders, in civil rights cases where  
17 there was either a direct lodestar award or a lodestar crosscheck against a  
18 percentage of the settlement or award fee.
- 19 ➤ Table 2: *Consumer/Wage & Hour Class Action Lodestar Crosschecks*. This is  
20 self-explanatory, and was taken from reported cases.
- 21 ➤ Table 3: *Commercial or Reported Standardized Rates Reflected in Select Attorney*  
22 *Fee Awards, Declarations or Reports*. These are a firm's standard rates reported  
23 either in a court filing, referred to in a court decision, provided to counsel, or  
24 contained in the 2009 Court Express summary of bankruptcy filings referred to  
25 previously.

26 18. Exhibit B contains three cuts of the same information, each containing three tables,  
27 organized and designated as follows: 1) organized by case; 2) organized by years of graduation,  
28 most to least; and 3) organized by rates, highest to lowest (based on the adjusted rate for the year  
2014, which concept is described below). I draw on this rate information in addressing the



1 reasonableness of the rates requested in the Plaintiffs' motion, and include what I consider the  
2 most relevant references in the body of this Declaration.

3 19. In the charts that I attach as Exhibit B, and incorporate as relevant into the body of this  
4 Declaration, I provide the following information:

5 Term	Description
6 Attorney	The name of the attorney awarded the rate 7 listed or, for the commercial firms, their 8 normal rates (or indicate if the individual identity is unknown)
9 Firm	The firm listed
10 Practice Yrs	The years in practice at the time of the award 11 or, if it could be clearly determined from the 12 opinion or other available information, the years in practice when the fee application was made. In parentheses are the years of law school graduation
13 Rate	The rate awarded in the case of awards, or 14 normally charged for commercial firms
15 Year	The year of the award or the year of the fee application if those rates were used.
16 Adjusted Rate	An adjustment to the fee award to 17 compensate for the passage of time, the basis for which is described in ¶¶ 22-27 below.

18 20. The name of the case in which the fee was awarded or, for commercial rates (where  
19 applicable) filed for, is noted by the use of a superscript number next to the name of the attorney.  
20 At the conclusion of the first set of charts in Exhibit B (and incorporated as relevant if the reference  
21 is used in the body of this Declaration), the name and case number, and/or Westlaw cite of the case  
22 is listed if the source is from a public filing. If the source is not from a public filing, the non-public  
23 source is identified.<sup>1</sup> In the past, I often attached documents not reported in Westlaw as exhibits.  
24 However, the total of those now numbers several hundred pages, and so it has become less practical  
25

26  
27 <sup>1</sup> So, for example, if the superscript uses the number "81" to designate the case, then the  
28 exhibit is maintained in my files as Exhibit 81.

1 and useful to attach them, and I have not done so. In the event the Court or opposing counsel  
2 wishes me to provide them, I will do so

3 21. The years of practice for an attorney are based on either information directly provided  
4 by the source or, where it was not so provided, by checking the attorney's website or the  
5 California State Bar Member Search. In some cases, the year of admission to the Bar may not be  
6 completely reliable because there may be reasons that an attorney's years of admission to the  
7 California State Bar are less than the years of practice. For example, an attorney may have  
8 practiced in another state before California or may have delayed admission while clerking for a  
9 judge or for some other reason. Where the attorney graduated from a California law school, it is  
10 likely that s/he graduated the same year as the Bar admission.

11 22. With respect to my analysis of commercial rates in Table 3 of Exhibit B, it is well  
12 established that civil rights rates were intended by Congress to be comparable to complex  
13 commercial litigation such as antitrust. *See, e.g., Craft v. Cnty. of San Bernardino*, 624 F. Supp.  
14 2d 1113, 1122-23 (C.D. Cal. 2008) ("declarations establish that the hourly rates set are similar to  
15 those for attorneys of comparable skill and experience at the rates paid for complex federal  
16 litigation, which was Congress' intent for civil rights cases. *See City of Riverside v. Rivera*, 477  
17 U.S. 561, 575-576, 106 S.Ct. 2686 (1986) (quoting Senate Report, at 6, U.S. Code Cong. &  
18 Admin. News 1976, p. 5913, *supra*, (Congress intended civil rights fees to be comparable to that  
19 for 'other types of equally complex Federal litigation, such as antitrust cases')"). I am aware of  
20 nothing to suggest that the legal work involved in the rates referenced in Table 3 is more  
21 complex than a complex civil rights case.

### 22 III. A FURTHER NOTE ON COMMERCIAL RATES

23 23. As I noted above, top tier commercial rates are routinely at even the very high end for  
24 civil rights attorneys. Given the complexity of much civil rights litigation, such a disparity is not  
25 justified based on the work or skill involved or required. In connection with this case, Plaintiffs'  
26 counsel provided me with a 2019 fee application from Gibson, Dunn & Crutcher in the  
27 bankruptcy case titled *In re: BROOKSTONE HOLDINGS CORP*, Case No. 18-11780 (BLS)  
28 (Dist. Del.). The rates are significant for purposes of this court's evaluation of reasonable rates in  
this case for comparably experienced attorney as those in Plaintiffs' team here. While I don't

1 know if Gibson Dunn gave a discount to Santa Monica based on a practice that some large firms  
2 have when representing government entities, it is appropriate to use what Gibson described to the  
3 Bankruptcy Court as its standard rates in *Brookstone* as a measure of reasonable rates in this  
4 case. In the chart below, I provide the names, titles, admission year and 2018 and 2019 rates for  
5 all those who are listed as litigation attorneys. (While most of the work was done by lawyers  
6 from the bankruptcy or corporate departments, the rates for those departments and litigation  
7 attorneys are comparable.) The Chart below provides the years of admission and the rates sought  
8 from the Gibson application for the litigation attorneys (Attached as Exhibit C is the relevant  
9 portion of that application.)

Name	Department	Title	Admission Year	2019 Rate	2018 Rate
Karlan, Mitchell	Litigation	Partner	1980	\$1495	\$1415
Collins, Michael	Litigation	Partner	2005	\$1205	\$1265
Leroy, Carrie	Litigation	Partner	2000	\$1025	\$1075
Frotney, Jonathan	Litigation	Associate	2010	\$975	\$925
Riddick, Tarana	Litigation	Associate	2015	\$895	\$815

16 24. The fees listed are national rates, as is indicated by the fact that the “professionals  
17 included in the Second Interim Fee Application did not vary their hourly rate based on the  
18 geographic location of the bankruptcy case.”

19 25. The foregoing rates do not refer to the attorneys in this case. However, lead defense  
20 counsel Theodore Boutrous is one of Gibson Dunn’s most well-known attorneys; he is listed in  
21 Best Lawyers In America; he was admitted to practice in 1987; based on Gibson Dunn’s general  
22 billing practices, his normal billing rate likely exceeds \$1500. Another of the Gibson Dunn  
23 defense attorneys, Marcellus A. McRae, also likely has a billing rate in that range.

#### 24 IV. ADJUSTMENT FACTOR

25 26. In this declaration and in the rate charts attached as Exhibit B, I use “Adjusted Rates”  
26 to compare the rates requested in this case to the historical rate data that I have presented. The  
27 “Adjusted Rate” is an inflation adjustment to show what a prior rate would be equivalent to in  
28 2018 adjusted for the passage of time. The adjustment is based on the mean (numerical average)

1 of the nation-wide Legal Services Component of the Consumer Price Index produced by the  
2 Bureau of Labor Statistics of the United States Department of Labor, which is reproduced by Dr.  
3 Michael Kavanaugh in his website for the "Updated Laffey Matrix." The "Updated Laffey  
4 Matrix" has been cited, and relied on, by courts in D.C.<sup>2</sup>

5 27. I used an adjustment factor of 3% per annum. I reached this number by taking the  
6 average (mean) annual rate increase of the Legal Services CPI nationally for the ten years June  
7 2008 to May 2019, which came to 3.0145% per year, and which I rounded down to 3%. See  
8 <http://www.laffeymatrix.com/see.html>. That this is a reliable and conservative national figure is  
9 confirmed by the fact that the inflation rate calculated for these years was significantly lower  
10 than the average inflation factor for the previous ten years, which was more than 4.5%, as  
11 reflected in the Updated Laffey Matrix.

12 28. Other information indicates that the 3% inflation factor is an understatement of the  
13 increase in rates over the past several years in major metropolitan areas. The 3% adjustment is a  
14 national figure, and fees in urban large metropolitan areas likely have risen more rapidly. Thus,  
15 for example, the Wall Street Journal reported in April 2013, that, in "the first quarter of 2013, the  
16 50 top-grossing U.S. law firms boosted their partner rates by as much as 5.7%, billing on average  
17 between \$879 and \$882 an hour" and that, in 2012, "legal fees in general rose 4.8% and associate  
18 billing rates rose by 7.4%, according to a coming report by TyMetrix Legal Analytics, a unit of  
19 Wolters Kluwer, and CEB, a research and advisory-services company. Those numbers are based  
20 on legal-spending data from more than 17,000 law firms." See Jennifer Smith, On Sale: the  
21 \$1,150-Per-Hour-Lawyer, Wall St. J., Apr. 9, 2013, at <http://www.wsj.com/articles>. A 2016

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22  
23 <sup>2</sup> See *Salazar v. Dist. of Columbia*, 123 F. Supp. 2d 8, 13 (D.D.C. 2000); *Smith v. Dist. of*  
24 *Columbia*, 466 F. Supp. 2d 151, 155 (D.D.C. 2006) (the use of the updated Laffey Matrix is  
25 reasonable and consistent with previous precedent from our Court of Appeals, as well as from this  
26 Court in *Salazar*" and is "more accurate in that the calculation was based on increases/decreases in  
27 legal services rather than increase/decreases in the entire CPI"); *McDowell v. District of*  
28 *Columbia*, Civ. A. No. 00-594 (RCL), LEXSEE 2001 U.S. Dist. LEXIS 8114 (D.D.C. June 4,  
2001) ("Plaintiffs may point to such evidence as an updated version of the Laffey matrix");  
*Salazar v. Dist. of Columbia*, 750 F. Supp. 2d 70, 72 (D.D.C. 2011) (affirming use of the adjusted  
rate based on the national legal services data for monitoring work in the case, and rejecting  
Defendant's contention that the United States Attorney's matrix should be used instead).



1 article reported an average billing rate increase of 3.2%. See Elizabeth Olson, Higher Fees  
2 Increase Law Firm Revenues by 4.1 Percent, N.Y. Times, Aug. 15, 2016, at  
3 [www.nytimes.com/2016/08/16/business/dealbook/higher-fees-increase-law-firm-revenue-by-4-  
4 1-percent.html](http://www.nytimes.com/2016/08/16/business/dealbook/higher-fees-increase-law-firm-revenue-by-4-1-percent.html). According to a March 2017 release from Wolters Kluwer's ELM Solutions and  
5 CEB, 2016 rates rose 7.3% at the associate level and 3.2% at the partner level. See also Forbes,  
6 July 7, 2016 ("According to data from CEB, the average hourly rate charged by major law firm  
7 partners nearly doubled since 2000").<sup>3</sup> These figures are considerably higher than the 3%  
8 adjustment factor that I have used.

9 29. The adjustment factor is important because it is not a valid comparison to take a fee  
10 from five years ago for, e.g., a ten-year lawyer and compare it to a fee requested by a ten-year  
11 lawyer today because the five-year-old fee does not account for the change in rates in today's  
12 legal dollars. In other words, the adjustment factor is simply a measure of inflation and the  
13 present value of money. In the same way that one cannot rent a one-bedroom apartment in 2018  
14 for the same monthly rate as a one-bedroom apartment in 2013, one cannot hire a ten-year  
15 attorney in 2018 for the same rate that was charged by a ten-year attorney in 2013.

16 30. The adjustment factor is a tool to approximate what the current rate for an attorney of  
17 the same years of experience would be awarded now, as opposed to when the award was actually  
18 made. It is important to understand, when looking at rates awarded to the same attorney in  
19 previous cases that the adjustment factor does not account for increased experience or expertise.  
20 A five-year old award for a particular attorney must be adjusted for both inflation and increases  
21 in skill and experience. To illustrate the point, assume that attorney John Doe was awarded a fee  
22

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23 <sup>3</sup> See also, e.g., Hildebrandt Institute, *Top Law Firms Still Tops in Rates, Billable Hours* at  
24 22, January 10, 2013, available at [http://hildebrandtblog.com/  
25 2013/01/10/top-law-firms-still-tops-in-rates-billable-hours](http://hildebrandtblog.com/2013/01/10/top-law-firms-still-tops-in-rates-billable-hours) ("A survey from The National Law  
26 Journal (NLJ) (registration required) found that median partner rates were up 4.5 percent from  
27 2011 to \$517 an hour in 2012, and the median associate rate rose 3.5 percent to \$323, with hourly  
28 rates ranging from \$130 to \$1,285 and a median hourly rate of \$432. This gibes with the findings  
of the Major Lindsey & Africa (MLA) "Partner Compensation Survey 2012," which recorded an  
hourly rate range from \$115 to \$1,265 and an average partner billing rate of \$584 (up from \$555  
in 2010).")

1 in 2013 when he was a ten-year attorney. My Adjusted Rate for the 2013 award only accounts  
2 for what a similar ten-year attorney would receive today. It does not account for the fact that that  
3 John Doe is now a fifteen-year attorney with five more years' experience. Since both the U.S.  
4 and California Supreme Courts have authorized payment of current rates to account for delay in  
5 payment, a simple inflation adjustment will not adequately compensate that attorney for the  
6 increased experience that s/he went unpaid. Thus, it is to be expected that the current rate for  
7 attorneys who have received previous awards will be meaningfully above the adjusted rate based  
8 on a prior award.

9 31. I have spent the time I have explaining the adjustment factor used because, in  
10 analyzing the rates, the only way to compare rates from prior years to the current year rates  
11 requested by plaintiffs' counsel in this case is to neutralize the effect of inflation and market  
12 changes over time.

13 32. I have been at times asked why I do not use generic surveys to determine rates. The  
14 simple answer is that surveys do not provide the most useful information for the relevant market.  
15 I principally rely on actual awarded rates in civil rights cases or class action lodestar cross checks  
16 in civil rights cases because these are awards in the same market, i.e., the market for Plaintiffs'  
17 complex civil rights cases in the major markets in California (Los Angeles and the Bay Area).  
18 *See, e.g., Blum v. Stenson*, 465 U.S. 886, 896, 104 S.Ct. 1541, 1547 (1984) ("the statute and  
19 legislative history establish that 'reasonable fees' under § 1988 are to be calculated according to  
20 the prevailing market rates in the relevant community"); *Trevino v. Gates*, 99 F.3d 911, 925 (9<sup>th</sup>  
21 Cir. 1996) ("the district court should not have relied on the rates paid by the City to private  
22 attorneys for defending excessive force cases as a starting point for the reasonable hourly  
23 rate....Private attorneys hired by a government entity to defend excessive force cases are not in  
24 the same legal market as private plaintiff's attorneys who litigate civil rights cases."). The  
25 relevant community here is Plaintiffs' lawyers in complex civil rights cases in Los Angeles (and,  
26 because rates in Northern California are comparable, Bay Area civil rights awards as well).  
27 Surveys do not reflect that market. Class actions and commercial rates for complex litigation are  
28



used as comparators because Congress intended civil rights awards to be comparable. See discussion in ¶ 21.

#### V. RATES REQUESTED

33. The rates being requested are for the lawyers identified in the table below, which includes their years of practice, are:

Attorney	Firm	Grad Yr (Yrs Practice)	Rate	Hours	Totals
Kevin Shenkman	Shenkman & Hughes	2002 (17)	\$815	4337.7	\$3,535,225.50
Mary Ruth Hughes	Shenkman & Hughes	2002 (17)	\$740	2239.3	\$1,657,082.00
John L Jones II	Shenkman & Hughes	2001 (18)	\$740	225.2	\$166,648.00
Andrea Alarcon	Shenkman & Hughes	2009 (10)	\$615	984.1	\$605,221.50
R. Rex Parris	Parris Law Firm	1980 (39)	\$975	1018.6	\$993,135.00
Robert A. Parris	Parris Law Firm	1991 (28)	\$900	57.15	\$51,435.00
Jonathan Douglass	Parris Law Firm	2013 (06)	\$575	179.3	\$103,097.50
Ellery Gordon	Parris Law Firm	2017 (02)	\$500	993.72	\$496,860.00
Dylan Williams	Parris Law Firm	2017 (02)	\$500	41.25	\$20,625.00
Marci Hilsinger	Parris Law Firm	Trial Paralegal	\$375	751.66	\$281,872.50
Milton Grimes	Law Offices Of Milton C. Grimes	1974 (45)	\$975	784.25	\$764,643.75
Wesley Ouchi	Law Offices Of Milton C. Grimes	2014 (05)	\$545	507.25	\$276,451.25
Robert Rubin	Law Offices Of Robert Rubin	1978 (41)	\$975	561.3	\$547,267.50
Mark Fahey	Law Offices Of Robert Rubin	2013 (06)	\$615	34.2	\$21,033.00
<b>TOTALS</b>				12,714.98	\$9,520,597.50

1           34. As reflected by Exhibit B, the rates sought in this case are well within the range of the  
2 rates charged by attorneys of comparable experience in the Southern California area for complex  
3 federal and civil rights work. Below I address the rates sought in this case, and compare them to  
4 attorneys of comparable or lesser experience, skill and reputation seeking or charging  
5 comparable or lesser rates.

6           35. Based on Plaintiffs' in this case against an intensely fought opposition, it is  
7 appropriate to award them rates at the top end of civil rights awards and at what (as I indicated  
8 above) is still meaningfully below top tier commercial rates for complex litigation. I address the  
9 different rate requests in the following sections. For the attorneys involved in the case who  
10 played what I will describe as a lead role (Kevin Shenkman, Mary Ruth Hughes, R. Rex Parris,  
11 Milton Grimes and Robert Rubin), I provide a brief description of my understanding of their  
12 experience, expertise and role in the case. For the other attorneys, I base my opinion regarding  
13 the reasonableness of their rates on the basis of their years or experience and the fact that they  
14 are associated with the lead attorneys in this case (which is the basis for most hourly rates for  
15 attorneys playing a support or secondary role, i.e., a combination of years of experience and rates  
16 for attorneys of comparable skill and experience working on complex litigation).

17           **VI. RATES FOR ATTORNEYS OF 40 PLUS YEARS' EXPERIENCE (R. Rex Parris,**  
18           **Milton Grimes and Robert Rubin) AND 28 YEARS' EXPERIENCE (Robert Parris)**

19           36. Robert Rubin initially practiced law with the ACLU in Mississippi after graduating  
20 law school in 1978, where he was involved in a variety of civil rights cases, including a  
21 nationally precedent-setting victory in which the US Supreme Court ruled that equal protection  
22 principles involving gender discrimination apply with equal force to males seeking admission to  
23 women-only nursing colleges. *Mississippi University for Women v. Hogan*, 458 US 718 (1982).  
24 Rubin spent the following 33 years at the Lawyers' Committee for Civil Rights in San Francisco,  
25 during approximately 15 years of which he was the Legal Director, and filed more than 60 civil  
26 rights actions in state and federal courts, including a voting rights case which reached the US  
27 Supreme Court twice with plaintiffs prevailing on both occasions. *See Lopez v. Monterey Cty.,*  
28 *Cal.*, 519 U.S. 9, 117 S. Ct. 340, 136 L. Ed. 2d 273 (1996). Rubin is currently in private practice  
and is widely regarded as one of the top voting rights litigators in California, which is his

1 exclusive professional focus. He filed and won the first action under the CVRA, *Sanchez v. City*  
2 *of Modesto*, 145 Cal. App. 4<sup>th</sup> 660 (2006), which upheld the constitutionality of the CVRA, an  
3 appellate ruling left undisturbed by the California and US Supreme Courts. Relying upon the  
4 *Sanchez* precedent, he has filed another dozen CVRA cases, all of which have either been  
5 favorably decided or settled.

6 I am advised that Milton C. Grimes is a nationally acclaimed civil rights attorney who has been  
7 practicing, as a trial lawyer, for the last forty-five (45) years. In this case, he played an  
8 instrumental role in trial preparations, trial and case planning, witness examinations, and the  
9 discovery process. His record includes several high-profile victories, including the landmark  
10 verdict in *Rodney King v. County of Los Angeles, et. al*, which forever changed the socio-  
11 political and legal landscape regarding police misconduct and systemic racism across the United  
12 States. In addition to his over three hundred (300) civil and criminal trials, Mr. Grimes has tried,  
13 along with Kevin Shenkman and R. Rex Parris, and in one instance Robert Rubin, three (3) out  
14 of the only four (4) California Voting Rights Act cases to proceed to trial. Due to his success  
15 and reputation in the courtroom, Mr. Grimes is frequently asked to lecture at various bar  
16 associations, law schools, and seminars, throughout the country, on the topics of trial lawyer  
17 skills, civil rights lawsuits, and criminal defense, and has served as the Vice President and Senior  
18 Staff Member of the Gerry Spence Trial Lawyers College, in Wyoming, since 1995.

19 37. I am advised the following regarding R. Rex Parris:

20 a. Mr. Parris is a well-known and highly regarded litigator and trial attorney  
21 who focuses on large personal injury cases, and has obtained numerous eight figure  
22 settlements and obtained the largest jury verdict in the country in 2009; has spoken  
23 extensively; has been named as a Super Lawyer and Best Lawyer for many years  
continuously since 2007.

24 b. Mr. Parris is the founding partner of the Parris Law Firm. Mr. Parris has a  
25 deep background in complex litigation stretching back to his time at Borton Petrini &  
26 Conron after graduating from Southwestern University School of Law in 1980. In 1986,  
27 Mr. Parris founded his own firm - the R. Rex Parris Law Firm (n/k/a the Parris Law  
28

1 Firm). Since that time, and particularly over the past 20 years, Mr. Parris and his firm  
2 have been responsible for some of the largest employment class actions in California -  
3 obtaining settlements and awards of more than \$100 million on multiple occasions. Mr.  
4 Parris is also an accomplished trial attorney, having achieved several eight and nine-  
5 figure jury verdicts and judgments in a wide variety of cases, and has taught trial  
6 advocacy at Pepperdine University School of Law and the Gerry Spence Trial Lawyers  
7 College.

8 c. Mr. Parris was extensively involved in other voting rights cases for the last  
9 seven years. Mr. Parris, Mr. Shenkman, and Mr. Grimes were primarily responsible for  
10 the trial of the first and second cases brought under the California Voting Rights Act to  
11 proceed to trial – *Jauregui v. City of Palmdale*, Los Angeles Superior Court Case No.  
12 BC483039 and *Garrett v. City of Highland*, San Bernardino Superior Court Case No.  
13 CIVDS1410696. Plaintiffs prevailed in both of those cases.

14 d. Mr. Parris has attracted national attention in the legal community for his  
15 voting rights work, trial advocacy, personal injury cases, and wage theft class actions.  
16 The Daily Journal, California Lawyer, The Met News, NBC Dateline, National Public  
17 Radio, and the Los Angeles Times, as well as other radio and television programs, have  
18 all featured him in numerous articles, broadcasts, and stories.

19 e. Mr. Parris believes that his financial benefit should be tied to that of his  
20 clients, and so over the past 10 years his engagements have been almost entirely on a  
21 contingency fee basis.

22 38. Below I list some relevant comparable rates from my Table 1 (Civil Rights/Public  
23 Interest Awards and Lodestar cross-checks). Messrs. Rubin, Grimes and Parris are all highly  
24 regarded and recognized attorneys of 39-44 years' experience, and each seeks an award of \$975  
25 per hour. Adjusted rates awarded in civil rights cases more than support that rate or higher, as is  
26 reflected in the Table 1 excerpts above. These three lawyers could well justify an award of  
27 \$1000-\$1100 per hour and are thus being eminently reasonable in limiting their rate to that  
28 figure. (I note that Mr. Rubin has previously been awarded this rate in a prior voting rights case.)



There are several awards for lawyers of substantially less experience receiving comparable or greater rates in adjusted dollars. For example, Jose Allen – an attorney at Skadden Arps – has been awarded over \$1200 in adjusted dollars in two reported civil rights cases (once as a 25 year attorney and once as a 31 year attorney). This is particularly significant in this case because, as noted, the defense attorneys in this case were from Gibson Dunn, comparable to Skadden; it is thus particularly appropriate to use Mr. Allen's rates as a comparison rate in determining the rates here. As noted in ¶ 22, complex civil rights litigation is most appropriately compared to other complex litigation, including complex commercial litigation, and should be compensated at similar rates. As I discuss immediately below, when commercial rates are used as the measure, the rates requested here are clearly on the low side as the Table 3 excerpts below demonstrate.

**Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks**

Attorney	Firm	Pract Yrs (Grad Yr)	Rate	Year	Adjusted Rate
Ian Herzog <sup>24</sup>	Law Office of Ian Herzog	44 (1967)	\$1,000	2011	\$1,267
Jose R. Allen <sup>35</sup>	Skadden, Arps	31 (1985)	\$1,150	2016	\$1,257
Barrett S. Litt <sup>38</sup>	KMBL	49 (1969)	\$1,150	2017	\$1,220
Jose R. Allen <sup>4</sup>	Skadden Arps	25 (1985)	\$930	2010	\$1,213
Barrett S. Litt <sup>40</sup>	KMBL	49 (1969)	\$1,150	2018	\$1,185
Barrett S. Litt <sup>34</sup>	KMBL	45 (1969)	\$975	2014	\$1,130
Sid Wolinsky <sup>4</sup>	DRA*	49 (1961)	\$835	2010	\$1,089
Paul R. Fine <sup>24</sup>	Daniels, Fine, Israel, Schonbuch & Lebovits	39 (1972)	\$850	2011	\$1,077
Barrett S. Litt <sup>6</sup>	Litt, Estuar & Kitson	40 (1969)	\$800	2009	\$1,075
Sid Wolinsky <sup>13</sup>	DRA*	51 (1961)	\$860	2012	\$1,058
Barrett S. Litt <sup>8</sup>	Litt, Estuar & Kitson	43 (1969)	\$850	2012	\$1,045
Unnamed <sup>10</sup>	Rosen Bien & Galvan	48 (1962)	\$800	2010	\$1,044
Barrett S. Litt <sup>15</sup>	Litt, Estuar & Kitson	39 (1969)	\$750	2008	\$1,038
Barrett S. Litt <sup>7</sup>	Litt, Estuar & Kitson	38 (1969)	\$725	2007	\$1,034
Dan Stormer <sup>3</sup>	HSKRR****	38 (1974)	\$825	2012	\$1,015
Bill Lann Lee <sup>18</sup>	Lewis, Feinberg, Lee, Renaker, & Jackson	38 (1974)	\$825	2012	\$1,015
Stephen Glick <sup>24</sup>	Law Offices of Stephen Glick	37 (1974)	\$800	2011	\$1,013
Paul L. Hoffman <sup>6</sup>	Schonbrun, de Simone	33 (1976)	\$750	2009	\$1,008
Mark Rosenbaum <sup>2</sup>	ACLU	35 (1974)	\$740	2009	\$994
Christopher Cox <sup>29</sup>	Weill Gotschall	23 (1991)	\$850	2014	\$985

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Attorney	Firm	Pract Yrs (Grad Yr)	Rate	Year	Adjusted Rate
Larry Paradis <sup>13</sup>	DRA*	27 (1985)	\$800	2012	\$984
Sanford J. Rosen <sup>12</sup>	Rosen Bien & Galvan	46 (1962)	\$700	2008	\$969
Daniel B. Kohrman <sup>4</sup>	AFL*****	26 (1984)	\$740	2010	\$966
Carol Sobel <sup>2</sup>	Law Ofc Carol Sobel	31 (1978)	\$710	2009	\$954
Carol A. Sobel <sup>6</sup>	Law Offices of Carol Sobel	31 (1978)	\$710	2009	\$954
Laurence Paradis <sup>4</sup>	DRA*	26 (1985)	\$730	2010	\$952

Although not justified on the merits, it is the case that rates for complex commercial litigation in adjusted dollars are generally higher, often significantly higher, than awarded civil rights rates for attorneys of comparable or less experience, as the following chart demonstrates. In addition to the rates provided in ¶¶ 23-24, where a 1980 lawyer (the same as Mr. Parris) was being compensated at \$1495 per hour, and a 2005 attorney was being compensated at \$1205 per hour (and where I estimated that Mr. Boutrous' normal rate likely exceeds \$1500), the following commercial rates in adjusted dollars, many for attorneys with far fewer years of experience, substantially exceed the rates requested here, especially since only about 1/3 of those in the chart below have over 30 years' experience and the rates in adjusted dollars all exceed \$1000 per hour.

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	Firm	Practice Yrs [Grad Yr]	Rate	Year	Adjusted Rate
Thomas J. Nolan <sup>82</sup>	Skadden Arps	40 (1971)	\$1095	2011	\$1,387
Daniel Perry <sup>93</sup>	Milbank, Tweed	14 (2000)	\$1135	2014	\$1,316
Jason D. Russell <sup>82</sup>	Skadden Arps	18 (1993)	\$1030	2011	\$1,305
Unnamed <sup>92</sup>	Davis, Polk & Wardwell	23 (1986)	\$960	2009	\$1,290
Unnamed <sup>92</sup>	Davis, Polk & Wardwell	19 (1990)	\$955	2009	\$1,283
Marc Becker <sup>81</sup>	Quinn Emanuel	24 (1988)	\$1035	2012	\$1,273
Unnamed <sup>91</sup>	Paul Hastings	36 (1974)	\$940	2010	\$1,226
Wayne Barsky <sup>86</sup>	Gibson Dunn	26 (1983)	\$905	2009	\$1,216
Unnamed <sup>85</sup>	Paul Hastings	33 (1978)	\$940	2011	\$1,191



**Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports**

Atty	Firm	Practice Yrs [Grad Yr]	Rate	Year	Adjusted Rate
Gordon Kirscher <sup>90</sup>	O'Melveny & Myers	38 (1971)	\$860	2009	\$1,156
Unnamed <sup>92</sup>	O'Melveny & Myers	34 (1975)	\$860	2009	\$1,156
Unnamed <sup>92</sup>	Klee, Tuchin, Bogdanoff, & Stern	19 (1990)	\$850	2009	\$1,142
Arturo Gonzalez <sup>83</sup>	MoFo	28 (1985)	\$950	2013	\$1,134
Daniel Kolkey <sup>86</sup>	Gibson Dunn	32 (1977)	\$840	2009	\$1,129
Unnamed <sup>84</sup>	Lieff Cabraser	42 (1970)	\$900	2012	\$1,107
Unnamed <sup>84</sup>	Lieff Cabraser	38 (1974)	\$900	2012	\$1,107
Unnamed <sup>11</sup>	Arnold & Porter	39 (1974)	\$910	2013	\$1,087
Andrew Bridges <sup>98</sup>	Fenwick & West	29 (1986)	\$930	2014	\$1,078
Unnamed <sup>85</sup>	Paul Hastings	23 (1998)	\$850	2011	\$1,077
Unnamed <sup>92</sup>	Weil, Gotschall & Manges	23 (1986)	\$799	2009	\$1,074
Brian J. Hennigan <sup>89</sup>	Irell & Manella	25 (1983)	\$775	2008	\$1,073
Unnamed <sup>92</sup>	Gibson Dunn & Crutcher	25 (1974)	\$790	2009	\$1,062
Marcellus McRae <sup>86</sup>	Gibson Dunn	21 (1988)	\$785	2009	\$1,055
Delilah Vinzon <sup>93</sup>	Milbank, Tweed	12 (2002)	\$900	2014	\$1,043
Alejandro Mayorkas <sup>90</sup>	O'Melveny & Myers	23 (1986)	\$770	2009	\$1,035
Unnamed <sup>92</sup>	Hennigan, Bennett & Dorman	30 (1979)	\$760	2009	\$1,021
Unnamed <sup>92</sup>	Pachulski, Stang et al.	27 (1982)	\$750	2009	\$1,008
Unnamed <sup>92</sup>	White & Case	24 (1985)	\$750	2009	\$1,008
Unnamed <sup>92</sup>	Morrison & Foerster	24 (1985)	\$750	2009	\$1,008
Victoria Maroulis <sup>81</sup>	Quinn Emanuel	13 (1999)	\$815	2012	\$1,002

39. Robert Parris, an attorney with 28 years' experience, requests an award of \$900 per hour. As I noted above, this rate is amply supported by the commercial rates provided above, most of which are for attorneys of less than 30 years' experience, including 15 with 25 years' experience or less. Four of the civil rights amounts listed in the Table 1 above are for attorneys

of less than Mr. Parris' years of experience. The table below provides additional civil rights awards of \$900 or more in adjusted dollars for attorneys of under 30 years' experience.

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Attorney	Firm	Pract Yrs (Grad Yr)	Rate	Year	Adjusted Rate
Dale Galipo <sup>32</sup>	Law Ofc Dale Galipo	25 (1989)	\$800	2014	\$927
Dale Galipo <sup>33</sup>	Law Ofc Dale Galipo	25 (1989)	\$800	2014	\$927
Matthew Righetti <sup>19</sup>	Righetti Glugoski	27 (1985)	\$750	2012	\$922
Robert Rubin <sup>20</sup>	LCCR	28 (1978)	\$625	2006	\$918
Anne Richardson <sup>38</sup>	Public Counsel	29 (1989)	\$850	2017	\$902

40. The commercial rates already provided amply support Mr. Parris' requested rate and need not be repeated.

**VII. RATES FOR ATTORNEYS OF 17-28 YEARS' EXPERIENCE (Kevin Shenkman, Mary Ruth Hughes and John L Jones II)**

41. I am advised the following regarding the attorneys from Shenkman & Hughes:

a. Kevin Shenkman and Mary Ruth Hughes are both attorneys of 17 years' experience and are partners at Shenkman & Hughes, and Mr. Jones is of comparable experience. Mr. Shenkman graduated from Columbia University School of Law and Ms. Hughes graduated from University of Southern California Gould School of Law, both in 2002; Mr. Jones graduated from Yale Law School one year earlier. It is my understanding that Mr. Shenkman was lead counsel in this case before and during trial and was responsible for coordinating the plaintiffs' efforts on multiple fronts, including discovery, motion work, appellate work, expert and witness preparation and trial. Ms. Hughes was involved in this case from the pre-filing investigation through post-trial briefing, and though she did not argue matters in court, she was involved in nearly all aspects of this case from her office.

b. Ms. Hughes, Mr. Jones and Mr. Shenkman all have backgrounds in complex litigation, having begun their careers at large law firms handling complex litigation - Mr. Shenkman and Mr. Jones at McKool Smith Hennigan LLP (f/k/a Hennigan Bennett & Dorman LLP), and Ms. Hughes at Gibson Dunn & Crutcher LLP.

1 All three have since been involved in other voting rights cases over the course of the last  
2 seven years. Ms. Hughes, Mr. Jones and Mr. Shenkman were primarily responsible for  
3 the handling of the first and second cases brought pursuant to the California Voting  
4 Rights Act to proceed to trial – *Jauregui v. City of Palmdale*, Los Angeles Superior Court  
5 Case No. BC483039 and *Garrett v. City of Highland*, San Bernardino Superior Court  
6 Case No. CIVDS1410696. Plaintiffs prevailed in both of those cases. Both cases were  
7 successful at trial and the preliminary injunction (which followed trial) in *Jauregui* was  
8 upheld on appeal. *See Jauregui v. City of Palmdale* (2014) 226 Cal. App. 4th 781  
9 (review denied, en banc, Aug. 20, 2014). In addition to those cases, Shenkman &  
10 Hughes has pursued more than a dozen other voting rights cases and has been successful  
11 in every one of those cases, and has been responsible for more than 100 political  
12 subdivisions in California reforming their election systems.

13 c. The attorneys of Shenkman & Hughes, and particularly Mr. Shenkman,  
14 have attracted a great deal of attention in the legal community and California generally  
15 for their voting rights work. They have been featured in the Daily Journal and the Los  
16 Angeles Times on several occasions, as well as various radio and television programs.

17 d. Though Shenkman & Hughes' practice has become increasingly  
18 contingency fee work, including their significant voting rights practice, Shenkman &  
19 Hughes also represents business clients and charges those business clients hourly-fees.  
20 All rates being requested for Shenkman & Hughes attorneys are those charged to their  
21 hourly-fee paying clients

22 42. Below I list some relevant comparable rates from my Table 1 (Civil Rights/Public  
23 Interest Awards and Lodestar cross-checks) for attorneys of 20 years' or less experience with  
24 awards similar to or higher than those sought for Mr. Shenkman, Ms. Hughes and Mr. Jones. I  
25 also list some additional commercial rates for attorneys of less than 20 or less experience,  
26 besides the many listed above that support these rates. Particularly in light of the central role that  
27 Mr. Shenkman played in the case (which more than justifies a premium), the fact that firm in  
28 particular necessarily eschewed taking on other cases, and that these are the rates they charge fee



1 paying clients, the \$815 sought for Mr. Shenkman and \$740 sought for Ms. Hughes and Mr.  
 2 Jones are eminently reasonable.

3 **Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks**

Attorney	Firm	Pract Yrs (Grad Yr)	Rate	Year	Adjusted Rate
Michelle Uzeta <sup>13</sup>	DRLC***	20 (1992)	\$700	2012	\$861
Michael Seplow <sup>5</sup>	Schonbrun, de Simone	20 (1990)	\$590	2010	\$770
Anne Richardson <sup>2</sup>	HSKRR****	20 (1989)	\$575	2009	\$773
Earnest Bell <sup>15</sup>	Law Offices of Earnest Bell	20 (1988)	\$600	2008	\$831
Julia Sherwin <sup>27</sup>	Haddad & Sherwin	19 (1995)	\$695	2014	\$806
Scott A. Brooks <sup>24</sup>	Daniels, Fine, Israel, Schonbuch & Lebovits	19 (1992)	\$650	2011	\$823
Julie Nepveu <sup>4</sup>	AFL*****	19 (1991)	\$660	2010	\$861
Shawna Parks <sup>37</sup>	DRLC	18 (1999)	\$745	2017	\$790
Ronald K. Tellis <sup>30</sup>	Baron & Budd	18 (1996)	\$775	2014	\$898
Todd Burns <sup>23</sup>	Law Office of Todd Burns	18 (1996)	\$650	2014	\$754
Bryan M. Miller <sup>8</sup>	Litt, Estuar & Kitson	18 (1994)	\$625	2012	\$769
Melissa Kasnitz <sup>4</sup>	DRA*	18 (1992)	\$650	2010	\$848
Shawna Parks <sup>35</sup>	Law Ofc Shawna Parks	17 (1999)	\$695	2016	\$759
Robert M. Kitson <sup>8</sup>	Litt, Estuar & Kitson	17 (1995)	\$625	2012	\$769
Hector O. Villagra <sup>1</sup>	ACLU	17 (1994)	\$600	2011	\$760
Robert Dell Angelo <sup>14</sup>	MTO**	17 (1992)	\$550	2009	\$739
Rebecca Grey <sup>25</sup>		16 (1998)	\$650	2014	\$754
Melissa Goodman <sup>40</sup>	ACLU	15 (2003)	\$715	2018	\$736
Matthew McNicholas <sup>17</sup>	McNicholas & McNicholas	15 (1997)	\$700	2012	\$861
Peter Eliasberg <sup>2</sup>	ACLU	15 (1994)	\$525	2009	\$706
Angela Padilla <sup>20</sup>	MoFo	15 (1991)	\$600	2006	\$881
Maronel Barajas <sup>37</sup>	DRLC	14 (2003)	\$675	2017	\$716
Gene J. Stonebarger <sup>31</sup>	Stonebarger Law, APC	14 (2000)	\$650	2014	\$754
Paul Estuar <sup>7</sup>	Litt, Estuar & Kitson	14 (1993)	\$485	2007	\$691
Amanda Goad <sup>40</sup>	ACLU	13 (2005)	\$640	2018	\$659
Matthew Stugar <sup>37</sup>	DRLC	13 (2004)	\$660	2017	\$700

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Attorney	Firm	Pract Yrs (Grad Yr)	Rate	Year	Adjusted Rate
Shawna Parks <sup>13</sup>	DRA*	13 (1999)	\$665	2012	\$818
Unnamed <sup>10</sup>	Bingham, McCutcheon	13 (1997)	\$655	2010	\$855
Unnamed <sup>10</sup>	Rosen Bien & Galvan	13 (1997)	\$560	2010	\$731
John Glugoski <sup>19</sup>	Righetti Glugoski	12 (1997)	\$650	2012	\$799
Paul Hughes <sup>38</sup>	Mayer, Brown	10 (2008)	\$730	2017	\$774
Jennifer Bezoza <sup>4</sup>	DRA*	10 (2000)	\$570	2010	\$744
Shawna Parks <sup>14</sup>	DRLC	10 (1999)	\$525	2009	\$706
Roger Heller <sup>4</sup>	DRA*	09 (2001)	\$560	2010	\$731

43. The commercial rates I have already provided more than justify the rates requested. As I previously noted, some 15 of them are for attorneys of under 20 years' experience, often with substantially higher rates than those sought here. The table below provides numerous additional documented commercial rates far higher than those sought here for attorneys of comparable or less experience.

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	Firm	Practice Yrs [Grad Yr]	Rate	Year	Adjusted Rate
Diane Hutnyan <sup>81</sup>	Quinn Emanuel	15 (1997)	\$790	2012	\$972
Amy Lalley <sup>94</sup>	Sidley Austin	16 (1998)	\$825	2014	\$956
Danielle Gilmore <sup>87</sup>	Quinn Emanuel	15 (1993)	\$685	2008	\$948
Unnamed <sup>91</sup>	Paul Hastings	16 (1994)	\$725	2010	\$946
Michal H. Strub <sup>89</sup>	Irell & Manella	18 (1990)	\$670	2008	\$927
Revi-Ruth Enriquez <sup>93</sup>	Milbank, Tweed	06 (2008)	\$800	2014	\$927
Unnamed <sup>85</sup>	Paul Hastings	17 (1994)	\$725	2011	\$918
Unnamed <sup>85</sup>	Paul Hastings	15 (1996)	\$725	2011	\$918
Unnamed <sup>92</sup>	Davis, Polk & Wardwell	04 (2005)	\$680	2009	\$914
Unnamed <sup>92</sup>	Pachulski, Stang et al.	24 (1985)	\$675	2009	\$907
Thomas M. Riordan <sup>90</sup>	O'Melveny & Myers	14 (1995)	\$675	2009	\$907
Todd Briggs <sup>81</sup>	Quinn Emanuel	12 (2000)	\$735	2012	\$904
Hillary A. Hamilton <sup>82</sup>	Skadden Arps	10 (2001)	\$710	2011	\$899
Melissa Dalziel <sup>81</sup>	Quinn Emanuel	12 (2000)	\$730	2012	\$898
Hannah Cannom <sup>93</sup>	Milbank, Tweed	08 (2006)	\$760	2014	\$881
Caitlin Hawks <sup>93</sup>	Milbank, Tweed	06 (2008)	\$760	2014	\$881



**Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports**

Atty	Firm	Practice Yrs [Grad Yr]	Rate	Year	Adjusted Rate
Unnamed <sup>92</sup>	White & Case	08 (2001)	\$655	2009	\$880
Unnamed <sup>92</sup>	Pachulski, Stang et al.	32 (1977)	\$650	2009	\$874
Unnamed <sup>92</sup>	Morrison & Foerster	17 (1992)	\$650	2009	\$874
Unnamed <sup>92</sup>	Klee, Tuchin, Bogdanoff, & Stern	12 (1997)	\$650	2009	\$874
Unnamed <sup>91</sup>	Paul Hastings	11 (1999)	\$670	2010	\$874
Liana Rubel <sup>98</sup>	Fenwick & West	17 (1997)	\$750	2014	\$869
Jennifer Kelly <sup>98</sup>	Fenwick & West	17 (1997)	\$750	2014	\$869
Unnamed <sup>92</sup>	Pachulski, Stang et al.	20 (1989)	\$645	2009	\$867
Unnamed <sup>84</sup>	Lieff Cabraser	21 (1991)	\$700	2012	\$861
Amy Lalley <sup>94</sup>	Sidley Austin	14 (1998)	\$700	2012	\$861
Unnamed <sup>91</sup>	Paul Hastings	10 (2000)	\$660	2010	\$861
Unnamed <sup>92</sup>	Gibson Dunn & Crutcher	12 (1997)	\$635	2009	\$853
Unnamed <sup>85</sup>	Paul Hastings	12 (1999)	\$670	2011	\$849
Jorge DeNeve <sup>90</sup>	O'Melveny &Myers	10 (1998)	\$620	2009	\$833
Alex Doherty <sup>94</sup>	Sidley Austin	06 (2008)	\$700	2014	\$811
Unnamed <sup>92</sup>	White & Case	06 (2003)	\$600	2009	\$806
Unnamed <sup>92</sup>	White & Case	04 (2004)	\$600	2009	\$806
Joseph Belichick <sup>98</sup>	Fenwick & West	11 (2003)	\$690	2014	\$800
Todd Gregorian <sup>98</sup>	Fenwick & West	10 (2005)	\$690	2014	\$800
Liwen Mah <sup>98</sup>	Fenwick & West	09 (2005)	\$690	2014	\$800
Unnamed <sup>84</sup>	Lieff Cabraser	17 (1995)	\$650	2012	\$799
Unnamed <sup>85</sup>	Paul Hastings	09 (2002)	\$630	2011	\$798
Erik Swanholt <sup>88</sup>	Greenberg Traurig	11 (1998)	\$575	2009	\$796
Unnamed <sup>85</sup>	Paul Hastings	08 (2003)	\$620	2011	\$785
Unnamed <sup>92</sup>	Weil, Gotschall & Manges	06 (2003)	\$580	2009	\$779
Suzanna Brickman <sup>83</sup>	MoFo	07 (2006)	\$650	2013	\$776
Unnamed <sup>92</sup>	Gibson Dunn & Crutcher	06 (2003)	\$570	2009	\$766
Allan Johnson <sup>90</sup>	O'Melveny &Myers	08 (2001)	\$565	2009	\$759
Unnamed <sup>85</sup>	Paul Hastings	07 (2004)	\$590	2011	\$747
Unnamed <sup>11</sup>	Arnold & Porter	09 (2004)	\$625	2013	\$746



**Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports**

Atty	Firm	Practice Yrs [Grad Yr]	Rate	Year	Adjusted Rate
Jennifer J. Johnson <sup>98</sup>	Fenwick & West	07 (2007)	\$640	2014	\$742
Unnamed <sup>84</sup>	Lieff Cabraser	14 (1998)	\$585	2012	\$719
Unnamed <sup>92</sup>	Pachulski, Stang et al.	14 (1995)	\$535	2009	\$719
Unnamed <sup>92</sup>	Morrison & Foerster	09 (2000)	\$535	2009	\$719

**VIII. RATES FOR ATTORNEYS OF 10 YEARS' EXPERIENCE OR LESS (Andrea Alarcon [10 years], Mark Fahey [6 years], Jonathan Douglass [6 years], Wesley Ouchi [5 years], Ellery Gordon [2 years] Dylan Williams [2 years],**

44. The rates sought for the five attorneys addressed in this section are as follows: 1) Andrea Alarcon (10 years, \$615); Mark Fahey (6 years, \$615), Jonathan Douglass (6 years, \$575); Wesley Ouchi (5 years, \$545); Ellery Gordon (2 years, \$500); and Dylan Williams (2 years, \$500).

45. For Ms. Alarcon (a ten year attorney), \$615 is an eminently reasonable rate, really at the low end of reasonable. The following awards from my Table 1 for civil rights lodestar cross-checks amply supports that rate:

**Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks**

Attorney	Firm	Pract Yrs (Grad Yr)	Rate	Year	Adjusted Rate
Paul Hughes <sup>38</sup>	Mayer, Brown	10 (2008)	\$730	2017	\$774
Lindsay Battles <sup>40</sup>	KMBL	10 (2008)	\$600	2018	\$618
Andrea Oxman <sup>37</sup>	DRLC	10 (2007)	\$600	2017	\$637
Kevin LaHue <sup>34</sup>	KMBL	10 (2004)	\$600	2014	\$696
Katherine Weed <sup>13</sup>	DRA*	10 (2002)	\$600	2012	\$738
Joseph J. Ybarra <sup>1</sup>	MTO**	10 (2001)	\$550	2011	\$697
Jennifer Bezoza <sup>4</sup>	DRA*	10 (2000)	\$570	2010	\$744
Shawna Parks <sup>14</sup>	DRLC	10 (1999)	\$525	2009	\$706
Matthew Strugar <sup>13</sup>	DRLC***	08 (2004)	\$525	2012	\$646
Jacob A. Kreilkamp <sup>1</sup>	MTO**	08 (2003)	\$505	2011	\$640
Sage Reeves <sup>14</sup>	DRLC	08 (2001)	\$475	2009	\$638
Mary-Lee Smith <sup>13</sup>	DRA*	07 (2005)	\$555	2012	\$683

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Attorney	Firm	Pract Yrs (Grad Yr)	Rate	Year	Adjusted Rate
Kevin Knestrick <sup>4</sup>	DRA*	07 (2003)	\$535	2010	\$698

46. For Mark Fahey (6 years, \$615), Jonathan Douglass (6 years, \$575); Wesley Ouchi (5 years, \$545), the following civil rights/lodestar cross-checks are relevant and in the range of the rates requested for them.

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Attorney	Firm	Pract Yrs (Grad Yr)	Rate	Year	Adjusted Rate
Caitlin Weisberg <sup>34</sup>	KMBL	06 (2008)	\$500	2014	\$580
Kasey Corbit <sup>4</sup>	DRA*	06 (2004)	\$500	2010	\$652
Debra Patkin <sup>13</sup>	DRLC***	05 (2007)	\$450	2012	\$553
Karla Gilbride <sup>13</sup>	DRA*	05 (2007)	\$430	2012	\$529
Stephanie Biedermann <sup>13</sup>	DRA*	05 (2007)	\$430	2012	\$529
Christine Chuang <sup>13</sup>	DRA*	05 (2007)	\$430	2012	\$529
Laura D. Smolowe <sup>1</sup>	MTO**	05 (2006)	\$460	2011	\$583
Mary-Lee Kimber <sup>4</sup>	DRA*	05 (2005)	\$475	2010	\$620
Matthew Strugar <sup>14</sup>	DRLC	05 (2004)	\$400	2009	\$538
Heather McGunigle <sup>22</sup>	DRLC	04 (2009)	\$375	2009	\$504
Bethany Woodard <sup>14</sup>	MTO**	04 (2005)	\$395	2009	\$531

47. For Ellery Gordon and Dylan Williams, both two year attorneys for whom the requested rate is \$500, the following civil rights/lodestar cross-checks are relevant and in the range of the rates requested for them.

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Attorney	Firm	Pract Yrs (Grad Yr)	Rate	Year	Adjusted Rate
Marina A. Torres <sup>1</sup>	MTO**	03 (2008)	\$385	2011	\$488
Sarala V. Nagala <sup>1</sup>	MTO**	03 (2008)	\$385	2011	\$488
Thomas Kennedy Helm <sup>27</sup>	Haddad & Sherwin	02 (2012)	\$325	2014	\$377



Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Attorney	Firm	Pract Yrs (Grad Yr)	Rate	Year	Adjusted Rate
Kara Janssen <sup>13</sup>	DRA*	02 (2010)	\$330	2012	\$406
Nathaniel Fisher <sup>4</sup>	Skadden Arps	02 (2008)	\$530	2010	\$692
Unnamed <sup>10</sup>	Bingham, McCutcheon	02 (2008)	\$400	2010	\$522
Mahogany Jenkins <sup>20</sup>	MoFo	02 (2004)	\$285	2006	\$419
Unnamed <sup>10</sup>	Prison Law Office	01 (2009)	\$275	2010	\$359
Stacey Brown <sup>7</sup>	Litt, Estuar & Kitson	01 (2006)	\$275	2007	\$392

48. A note that I believe the court should take account of is that rates for newer lawyers have trended higher over the past few years, i.e., in the first few years of practice, rates have been rising at substantial percentages through the first 6-8 years, after which the rate of increase tapers off. The civil rights rates do not adequately reflect this phenomenon, which are clearly reflected in the commercial rate tables already provided and in the further table below

49. As is the case consistently, commercial rates for 5-6 year attorneys are far higher. Because so many young attorneys' commercial rates are in this range, and higher even for three-six year attorneys, I include in this table relevant rates that more than support the requested rates for Mark Fahey (6 years, \$615), Jonathan Douglass (6 years, \$575) and Wesley Ouchi (5 years, \$545), which show that even three or four year attorneys charge such commercial rates.

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	Firm	Practice Yrs [Grad Yr]	Rate	Year	Adjusted Rate
Unnamed <sup>85</sup>	Paul Hastings	06 (2005)	\$565	2011	\$716
Danielle Katzir <sup>86</sup>	Gibson Dunn	05 (2004)	\$525	2009	\$706
Unnamed <sup>92</sup>	Hennigan, Bennett & Dorman	09 (2000)	\$505	2009	\$679
Unnamed <sup>92</sup>	Weil, Gotschall & Manges	04 (2005)	\$500	2009	\$672
Unnamed <sup>85</sup>	Paul Hastings	05 (2006)	\$530	2011	\$671
Multiple associates <sup>86</sup>	Gibson Dunn	04 (2005)	\$495	2009	\$665
Dena G. Kaplan <sup>89</sup>	Irell & Manella	05 (2003)	\$475	2008	\$658
Kathleen Lu <sup>98</sup>	Fenwick & West	05 (2009)	\$560	2014	\$649
Alex Doherty <sup>94</sup>	Sidley Austin	04 (2008)	\$520	2012	\$640

**Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports**

Katherine Eklund <sup>93</sup>	Milbank, Tweed	05 (2009)	\$550	2014	\$638
Unnamed <sup>85</sup>	Paul Hastings	04 (2007)	\$500	2011	\$633
Melissa Barshop <sup>86</sup>	Gibson Dunn	03 (2006)	\$470	2009	\$632
Unnamed <sup>92</sup>	Gibson Dunn & Crutcher	03 (2006)	\$470	2009	\$632
Unnamed <sup>92</sup>	Weil, Gotschall & Manges	03 (2006)	\$465	2009	\$625
Unnamed <sup>92</sup>	Munger, Tolles & Olson	04 (2005)	\$450	2009	\$605
Abby Schwartz <sup>90</sup>	O'Melveny & Myers	03 (2006)	\$450	2009	\$605
Unnamed <sup>92</sup>	Munger, Tolles & Olson	04 (2005)	\$435	2009	\$585
Annasara Purcell <sup>98</sup>	Fenwick & West	03 (2011)	\$505	2014	\$585

50. Similarly, commercial rates for these two year attorneys support the requested \$500 per hour for them.

**Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports**

Atty	Firm	Practice Yrs [Grad Yr]	Rate	Year	Adjusted Rate
Lauren McCray <sup>94</sup>	Sidley Austin	02 (1998)	\$495	2014	\$574
Yungmoon Chang <sup>97</sup>		02 (2016)	\$554	2018	\$571
Unnamed <sup>85</sup>	Paul Hastings	03 (2008)	\$450	2011	\$570
Kimberly A. Svendsen <sup>89</sup>	Irell & Manella	04 (2004)	\$410	2008	\$568
Hirad Dadgostar <sup>88</sup>	Greenberg Traurig	03 (2006)	\$400	2008	\$554
Unnamed <sup>92</sup>	Munger, Tolles & Olson	03 (2006)	\$400	2009	\$538
Multiple associates <sup>86</sup>	Gibson Dunn	02 (2007)	\$400	2009	\$538
Armen Nercessian <sup>98</sup>	Fenwick & West	02 (2012)	\$450	2014	\$522

51. The rates of Gibson Dunn attorneys shown in Exhibit C also support the \$500 rate requested for these two-year attorneys. The 2019 rates for three-year attorneys (no two-year attorneys appear) in Exhibit C range from \$695 to \$850, and Exhibit C also shows their 2018 rates (when they were two-year attorneys) ranged from \$595 to \$755. Exhibit C also



demonstrates that the rates for Gibson Dunn attorneys rose approximately \$100 (nearly 20%) between their second and third years.

### IX. PARALEGAL RATES

52. I understand that the Parris Law Firm is seeking compensation for a paralegal, Marci Hilsinger, at the rate of \$375 per hour. Below I provide some rates for paralegals from both my civil rights and commercial charts that show that the requested \$375 rate is reasonable. It should be noted that, as I have been advised, Ms. Hilsinger has decades of trial experience as a paralegal, and is the most senior paralegal at the Parris Law Firm.

**Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks**

Attorney	Firm	Pract Yrs (Grad Yr)	Rate	Year	Adjusted Rate
Technology manager <sup>4</sup>	Skadden Arps		\$320	2010	\$418
Legal assistant <sup>4</sup>	Skadden Arps		\$285	2010	\$372
Julia White <sup>38</sup> [Sr. Paralegal]	KMBL		\$335	2017	\$355
Senior paralegals <sup>4</sup>	DRA*		\$265	2010	\$346
Julia White <sup>40</sup> [Sr. Paralegal]	KMBL		\$335	2018	\$345
Julia White <sup>34</sup> [Sr. Paralegal]	KMBL		\$295	2014	\$342

**Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports**

Name Or Position	Firm	Position	Rate	Year	Adjusted Rate
Sr. Paralegal <sup>91</sup>	Paul Hastings		\$330	2010	\$431
Paralegal <sup>86</sup>	Gibson Dunn		\$315	2009	\$423
Paralegal <sup>90</sup>	O'Melveny & Myers		\$310	2009	\$417
Paralegal <sup>86</sup>	Gibson Dunn		\$300	2009	\$403
Sarah Victoria <sup>98</sup>	Fenwick & West	Paralegal	\$345	2014	\$400
Paralegal <sup>86</sup>	Gibson Dunn		\$295	2009	\$396
Legal Assistant <sup>82</sup>	Skadden Arps		\$295	2011	\$374
Keith Catuara <sup>97</sup>		Paralegal	\$334	2018	\$344
Robert Winant <sup>98</sup>	Fenwick & West	Paralegal	\$295	2014	\$342

1           53. The rates of Gibson Dunn paralegals shown in Exhibit C also support the \$375 rate  
2 requested for Ms. Hilsinger. The 2019 rates for paralegals in Exhibit C range from \$435 to \$515.

3  
4                           **X.       REASONABLENESS OF HOURS**

5           54. I am aware that plaintiffs' counsel includes attorneys at four law firms who are  
6 requesting fees for their work on this case. In my experience, it is common for there to be large  
7 teams with multiple firms on the plaintiffs' side in a case as complex as this one. This is one  
8 means by which plaintiffs' attorneys from relatively small firms can effectively combat large  
9 firm resources such as those brought to bear in this case by Gibson Dunn. As I understand it, the  
10 team was assembled to provide a combination of skills needed to successfully litigate the case  
11 through trial – including particularized voting rights expertise (Shenkman & Hughes and Mr.  
12 Rubin's firm), substantial trial experience (Mr. Parris' and Mr. Grimes' firms), and knowledge  
13 and sensitivity to the racial issues involved. This case was brought to trial on a relatively  
14 expedited timetable, with the trial commencing only slightly more than two years after the  
15 complaint was filed. The work included a) an expert-intensive six-week trial; b) three writ  
16 petitions; c) a petition for review to the California Supreme Court; d) a summary judgment  
17 motion; e) two pleading challenges; f) twenty-four (24) depositions of fact witnesses; g) eight (8)  
18 depositions of expert witnesses; and h) thirty-one (31) discovery motions. The attorneys put  
19 together an effective and successful team that successfully prosecuted a novel case against a full-  
20 throated defense. As is clear from my tables in Exhibit B, it is common for there to be large  
21 teams in cases involving complex civil rights injunctive relief cases attacking novel social and  
22 legal problems. Such staffing is reasonable and justified where there is a large volume of work  
23 and complex legal and factual questions whose resolution benefits from attorneys with  
24 specialized expertise related to the issues and challenges involved.

25           55. It is also my understanding that care was taken to prevent duplication of work. Mr.  
26 Shenkman played the lead coordinating role in the case, which allowed him to be fully informed  
27 of the activities of the different attorneys, and ensure that work was divided effectively and  
28 efficiently.



1       56. Based on my experience in complex civil rights cases, the number of hours worked  
2 collectively by Plaintiffs' attorneys (and one paralegal) – 12,718.58 - is reasonable in light of the  
3 nature and importance of the case, the length of the litigation, the length of the trial, and the full-  
4 throated defense effort of Defendant and its attorneys in-house and at Gibson Dunn. In assessing  
5 the reasonableness of hours, deference must be given to the prevailing plaintiffs, who are best  
6 equipped and incentivized to assess the hours needed since they only get paid if they are  
7 successful (unlike defense counsel) and thus have no interest in churning a case, especially a  
8 risky and novel case. As the Court stated in *Moreno v. City of Sacramento*, 534 F.3d 1106, 1112  
9 (9th Cir. 2008) (overturning fee reduction), "It would ... be the highly atypical civil rights case  
10 where plaintiff's lawyer engages in churning. *By and large, the court should defer to the winning*  
11 *lawyer's professional judgment as to how much time he was required to spend on the case; after*  
12 *all, he won, and might not have, had he been more of a slacker."* (Emphasis supplied.)

#### 13                   XI.     MULTIPLIER

14       57. Under California law, a multiplier is appropriate and may be ordered by the court at  
15 its discretion, and is particularly appropriate when a case is taken on a contingency basis, to  
16 compensate for the risks involved in not being compensated at all. Based on my more than thirty  
17 years working on cases on a contingency basis, lawyers who take such cases are aware that there  
18 are many potential obstacles to recovering the relief that they seek, including motions to dismiss  
19 on various grounds, motions for summary judgment, and the many procedural requirements that  
20 accompany complex civil litigation. I am informed that in this case, the attorneys for the  
21 Defendant opposed plaintiffs at every stage and litigated this case aggressively. I am informed  
22 that the plaintiffs' attorneys here are seeking a multiplier of 2.25. In my opinion, that is a  
23 reasonable request given the challenges and intense opposition Plaintiffs encountered throughout  
the case, the novel issues involved and the risks undertaken by Plaintiffs' counsel.

24       58. Because of my experience and specialization in public interest and civil rights  
25 litigation, I am especially familiar with the availability of attorneys in the Southern California  
26 area to do such work. Relatively few lawyers are available or willing to undertake such matters.  
27 Thus, it is very important, when an attorney obtains a successful result for clients, as Plaintiffs'  
28 counsel did in this case, that the statutory attorneys' fees to which the attorneys are entitled are

1 fully awarded by the Court. Given the challenges faced in these kinds of cases, I conclude that  
2 the successful outcome in this case was the result of the efforts and skill of all of the involved  
3 attorneys, who took a substantial risk to vindicate the rights of their clients and, more generally,  
4 the Latino residents of Santa Monica. Accordingly, in my opinion, they should be awarded fees  
5 in the amounts sought with a substantial multiplier.

6 59. I have been awarded contingent risk enhancements in several cases. In 2002, in the  
7 context of settlement of a large class action in which I was lead counsel, my firm was awarded a  
8 fee award that amounted to a multiplier of more than 2.0 by Magistrate Judge Woehrlé in  
9 *Williams v. Block*, CV-97-03826-CW (Central District of California). In *Bynum v. District of*  
10 *Columbia*, Civil Action No. 02-956 (RCL), a strip search and overdetection class action in  
11 Washington D.C. in which I was lead counsel, the class fund fee award amounted to a multiplier  
12 of two. In *Craft v. County of San Bernardino*, *supra* at §12, the class fund award resulted in a  
13 multiplier of over five, which Judge Larson found reasonable. These were class fund fee awards  
14 in class actions.

15 60. I have also been personally involved in statutory fee cases such as this, either as one  
16 of the attorneys involved or as a fee expert, in which multipliers were awarded. In the case  
17 described in paragraph 9, in which I was an expert witness on fee issues, the arbitrator awarded a  
18 multiplier of 1.75, based at least in part on my testimony in that case. In *Molina v. Lexmark*  
19 *International Inc.*, LA Super. Ct. No. BC339177, Order Granting Plaintiff's Motion for  
20 Attorney's Fees and Costs, filed Oct. 28, 2011 (in which I wrote a fee declaration), the Court  
21 awarded a multiplier of 2.0. In *Rodriguez et al. v. County of Los Angeles et al.*, CV 10-6342-  
22 CBM (AJWx), in which I was one of several counsel awarded fees, and in which I also acted as a  
23 fee expert, the Court awarded a multiplier of 2.0 in a fee claim under the Bane Act.

24 61. Similarly, there are numerous reported California cases awarding multipliers of 2.0  
25 and above in which I was not personally involved. *See, e.g., Ketchum v. Moses*, 24 Cal. 4th 1122  
26 (2001) (2.0 multiplier); *Chavez v. Netflix, Inc.*, 162 Cal. App. 4th 43, 66 (Cal. Ct. App. 2008)  
27 (2.5 multiplier); *Crommie v. PUC*, 840 F. Supp. 719, 726 (N.D. Cal. 1994) (2.0 multiplier), *aff'd*  
28 *sub nom Mangold v. PUC*, 67 F.3d 1470 (9th Cir. 1995); *Uphold our Heritage v. Town of*

1 *Woodside*, No. A120749, 2008 WL 4868816 (Cal. Ct. App. Nov. 12, 2008) (2.0 multiplier);  
2 *Leuzinger v. Cnty. of Lake*, No. C 06-00398-SBA, 2009 WL 839056 (N.D. Cal. Mar. 30, 2009)  
3 (2.0 multiplier).

4       62. I believe that a multiplier is necessary in a case of this type under California law in  
5 order to be faithful to the market analysis explained in depth by the California Supreme Court in  
6 *Ketchum v. Moses*, 24 Cal.4th 1122, 1133 (2001) (“purpose of a fee enhancement, or so-called  
7 multiplier, for contingent risk is to bring the financial incentives for attorneys enforcing  
8 important constitutional rights ... into line with incentives they have to undertake claims for  
9 which they are paid on a fee-for-services basis”). Cases of this type entail substantial risk. The  
10 market rewards such risk by enhancing the lodestar to account for that risk so that “cases  
11 involving enforcement of constitutional rights, but little or no damages” are “economically  
12 feasible.” *Ketchum*, 24 Cal. 4th at 1132-33, 1136; *cf. Horsford v. Bd. of Trustee*, 132 Cal. App.  
13 4th 359, 399-401 (2005) (risk enhancement “required”; “a failure to fully compensate for the  
14 enormous risk” of the suit would “effectively immunize large or politically powerful defendants  
15 from being held to answer ..., resulting in harm to the public”). Enhancements for contingent  
16 risk are not a “bonus” or “windfall;” they are “*earned compensation*.” *Ketchum*, 24 Cal. 4th at  
17 1138 (emphasis added).

18       63. A multiplier is especially appropriate in this case. Santa Monica mounted a fierce  
19 opposition in this case. It retained Gibson, Dunn & Crutcher, which spared no effort in its attempt  
20 to defeat Plaintiffs’ claim. I am advised that immediately before the trial began, Gibson attorney  
21 Theodore Boutrous described this case as one of first impression, and his partner, Kahn Scolnick,  
22 stated that, if Santa Monica could not win this case, then no CVRA cases could be won. The case  
23 was particularly risky, as is reflected by the fact that a large firm Plaintiffs’ counsel approached  
24 declined the case due to its high level of risk; MALDEF similarly declined a request to become  
25 involved. Substantial other work had to be declined, given that, over a two-year period,  
26 Plaintiffs’ firms devoted well over 10,000 hours to the case, including a six-week trial. All this  
27 indicates this is precisely the kind of case in which a substantial multiplier is called for – novel  
28

1 issues, all consuming, intensely opposed, requiring virtually exclusive attention, and highly  
2 risky. It would be difficult to identify a case more appropriate for a multiplier than this one.

3 64. This case well illustrates the reason that such enhancements are necessary in order to  
4 promote the public policy underlying civil rights and public interest litigation by making them  
5 economically viable.

6 I declare, under penalty of perjury, that the foregoing is true and correct.

7 Executed at Pasadena, California on June 3, 2019.

8   
9 Barrett S. Litt

## EXHIBIT A



**Barrett S. Litt**  
**Kaye, McLane, Bednarski & Litt, LLP**  
**975 East Green Street**  
**Pasadena, California 91106**  
**Telephone: (626) 844-7660**  
**Facsimile: (626) 844-7670**

## **Education**

1966 B.A. University of California at Berkley  
1969 J.D. UCLA School of Law

## **Honors and Awards**

1987 Pro Bono Firm of the Year Award from Public Counsel (Litt & Stormer)  
1992 Civil Rights Firm of the Year Award from the NAACP Legal Defense Fund (Litt & Marquez)  
1995 Public Interest Alumnus of the Year Award from UCLA School of Law  
2010 California Lawyer Attorney of the Year Award (CLAY)

## **Recent Contributions to Professional Publications**

“Class Certification in Police/Law Enforcement Cases”, *Civil Rights Litigation and Attorney’s Fee Annual Handbook*, Vol.18, Ch.3, West Publishing 2002

“Rights for Wrongs”, addressing issues under the California Civil Rights statutes, *Los Angeles Lawyer Magazine*, December 2005

“Select Substantive Issues Regarding Class Action Litigation In The Jail/Prison Setting”, *National Police Accountability Project*, October 2006

“Obtaining Class Attorney’s Fees,” *Civil Rights Litigation and Attorney’s Fee Annual Handbook*, Vol.26, West Publishing 2010

## **Professional**

1/2013 to the present	Kaye, McLane, Bednarski & Litt, LLP
2004 to 2012	Litt, Estuar & Kitson, LLP
1997 to 2004	Litt & Associates
1991 to 1997	Litt & Marquez
1984 to 1991	Litt & Stormer

### **Licensed to practice in:**

State of California  
U.S. District Court, Central District of California  
U.S. District Court, Eastern District of California  
U.S. District Court, Northern District of California  
Ninth Circuit Court of Appeals  
Fourth Circuit Court of Appeals  
Fifth Circuit Court of Appeals  
Eleventh Circuit Court of Appeals  
D.C. Circuit Court of Appeals  
United States Supreme Court

### **Admitted Pro Hac Vice in:**

U.S. District of Columbia  
U.S. District Court, Northern District of Georgia  
U.S. District Court, District of Maryland

**Rated "AV" by Martindale-Hubbell**

**Listed in *Southern California Super Lawyers* in the fields of civil rights and class actions for the years 2005-present.**

**Listed in Best Lawyers in America (Los Angeles area) in the field of civil rights.**

### **Civil Rights Class Actions – Classes Certified and Cases Currently Pending:**

***McKibben v. County of San Bernardino*, Case No.: EDCV 14-2171 - JGB (SPx) (certified class action for injunctive relief and damages for unequal treatment of Gay, Bisexual and Transgender jail inmates; class size of 650**

people; final approval of settlement for injunctive relief, class damages and attorneys' fees approved on Feb. 11, 2019, but extended due to defendants' inadvertent omission of some class members)

*Amador v. Baca*, No.: 10-1649 SVW (RC) (C.D. Calif) (pending certified class action challenging manner of searches of women inmates in outside bus bay; estimated number of class members is an estimated 94,000; 23 (b)(2) and (b)(3) classes certified; summary judgment on liability granted to Plaintiffs; settlement negotiations are expected to conclude before summer 2019);

*Roy v. Los Angeles County Sheriff's Department*, Case No.: CV 12-9012 RGK (FFMx) (pending class action for injunctive relief and damages;(b)(2) and (b)(3) classes certified in Sept. 2016; summary judgment on liability granted; settlement discussions pending);

*Chua et al. v. City of Los Angeles, et al.* Case No.: CV-00237-JAK-GJS(x) (C.D. Calif.) (pending class action for injunctive relief and damages for arrests and related actions regarding Ferguson related protests at 6<sup>th</sup> & Hope and Beverly & Alvarado; estimated class size is 170; class certification granted; settlement agreed to pending City Council and Court approval);

#### **Civil Rights Class Actions – Classes Certified and Cases Resolved:**

*Williams v. Block*, Case No.: CV-97-03826-CW (Central District of California) and related cases (a series of county jail overdetention and strip search cases, settled for \$27 Million and a complete revamp of jail procedures; classes certified in conjunction with settlement; class size over 250,000);

*Craft v. County of San Bernardino*, 468 F.Supp.2d 1172 (C.D.Cal. 2006) (certified class action against the Sheriff of San Bernardino County for blanket strip searches of detainees, arrestees, and persons ordered released from custody; partial summary judgment decided for plaintiffs; class size approximately 150,000; \$25.5 Million settlement approved April 1, 2008);

*MIWON v. City of Los Angeles*, Case No.: CV 07-3072 AHM (C.D. Calif.) (certified class action against City of Los Angeles and others for use of police force and related conduct at MacArthur Park on May 1, 2007; final

approval of class settlement for \$12,800,000 settlement granted June 24, 2009, the largest class action protest settlement in the U.S.);

*Bynum v. District of Columbia*, Case No.: 02-956 (RCL) (D.D.C.) (certified class action against the District of Columbia for overdetections and blanket strip searches of persons ordered released from custody; final approval of \$12,000,000 settlement occurred January 2006 );

*Nozzi v. Housing Authority of the City of Los Angeles*, CV 07-00380 GW (C.D. Calif.) (pending certified class action against the Housing Authority for violations of due process and federal regulations by failing to provide proper notice of Section 8 rent increase affecting approximately 10,000 tenants; case dismissed on sj for defendants; reversed by Ninth Circuit; dismissed again; reversed second time in *Nozzi v. Hous. Auth. of City of Los Angeles*, 806 F.3d 1178 (9th Cir. 2015), *as amended on denial of reh'g and reh'g en banc* (Jan. 29, 2016; case pending).and summary judgment on liability ordered entered for Plaintiffs; on remand, (b)(2) and (b)(3) classes certified in *Nozzi v. Hous. Auth. of the City of Los Angeles*, No. CV 07-380 PA (FFMX), 2016 WL 2647677, at \*1 (C.D. Cal. May 6, 2016)); final approval for \$9.25 Million settlement granted);

*Barnes v. District of Columbia*, Civil Action No.: 06-315 (RCL) (D.D.C.) (class action against District of Columbia for continuing to both over-detain and strip search post-release inmates despite settlement in *Bynum, supra*; class certification granted; summary judgment granted Plaintiffs on most claims; case ultimately settled for \$6 Million);

*Lopez v. Youngblood*, No.: CV07-00474 LJO (DLBx) (E.D. Calif.) (certified class action against Kern County, California, for unlawful pre-arraignment and post-release strip searches and strip searches not conducted in private; class certification and summary judgment on liability granted; approximately \$7 Million settlement);

*Aichele et al. v. City of Los Angeles, et al.* Case No.: CV 12-10863 DMG FFM (x) (C.D. Calif.) (certified class action for injunctive relief and damages for arrests and related actions regarding the shutdown of the use of the City Hall lawn by Occupy LA; estimated class size is 300-400; class certified; \$2,675,000 settlement);



*Gail Marie Harrington-Wisely, et al. v. State of California, et al.*, Superior Court Case No.: BC 227373 (a case involving searches of visitors to California prisons utilizing backscatter x-ray methods without reasonable suspicion; injunctive relief class certified; stipulated injunction entered; partial reversal on appeal and case returned to Superior Court for determination of attorney's fees and discrete damages claims; case settled for approximately 15 individual damages claims decertified in light of certain liability determinations on appeal; injunctive relief attorneys' fee resolved in excess of \$4 Million.)

*Ofoma v. Biggers*, Case No.: 715400 (Complex Litigation Panel) (Orange County Superior Court)(family discrimination class action settled in 1996 for damages for the individual plaintiffs and the class of residents, a consent decree and an award of attorneys' fees);

*Francis, et al. v. California Department of Corrections, et al.*, Case No.: BC302856 (class action against the CDC(R) for the failure to reimburse inmates assigned to the restitution centers in Los Angeles for their obligations as ordered by the court. Case was successful in bringing about the restructuring of the CDCR's inmate accounting systems, and in the payment of restitution settlement in the amount of \$325,000.)

*People of the State of California v. Highland Federal Savings and Loan*, Case No.: CA 718 828 (Los Angeles Superior Court)(class action filed on behalf of the People of the State of California and a class of tenants residing in several slum buildings located in Los Angeles for financing practices encouraging and perpetuating slum conditions, settled for \$3.165 million after decision in *People v. Highland*, 14 Cal.App.4th 1692, 19 Cal. Rptr. 555 (1993) established potential liability for lenders);

*Hernandez v. Lee*, No.: BC 084 011 (Los Angeles Superior Court)(a class action on behalf of tenants of numerous buildings for slum conditions settled in 1998 for \$1,090,000);

*Mould v. Investments Concept, Inc.*, Case No.: CA 001 201 (Los Angeles Superior Court)(race discrimination class action on behalf of a class of applicants and potential housing applicants, settled in 1992 for a total of \$850,000 for the class and a comprehensive consent decree regarding the defendants' discriminatory policies and practices);

*California Federation of Daycare Association v. Mission Insurance Co.*, Case No.: CA 000 945 (Los Angeles Superior Court)(class action on behalf of several thousand family daycare providers whose daycare insurance policies were canceled mid-term or were not renewed by Mission Insurance Company, settled in 1980's for reinstatement of policies and attorney's fees; brought at request of Public Counsel).

**Pending Class Actions Where Class certification has not yet been addressed:**

*Brewster v. City of Los Angeles*, Case No.: EDCV14-2257- JGB (SPx) (class action for injunctive relief and damages for 30 day impounds of cars without a warrant; class certification motion and motion for preliminary injunction pending; case dismissed and currently on appeal);

*M.S. v. County of Ventura*, No. 2:16-CV-03084-BRO-RAO(x) (C.D. Calif.) (recently filed class action for injunctive relief and damages for failure to provide mental health treatment to criminal defendants held in jail and found incompetent to stand trial until their mental health is restored).

*Coordinated Proceeding, County Inmate Telephone Service Cases* Case No: JCCP 4897 (Superior Court for the County of Los Angeles (nine pending class action complaints against nine counties coordinated in Los Angeles and consolidated into a single complaint alleging that the telephone charges to jail inmates and inmate callers constitute an unlawful tax under the California Constitution, seeking injunctive relief and damages).

*Puente v. City of Phoenix*, Case 2:18-cv-02778-JJT (District of Arizona) (pending class action against the City of Phoenix for the unlawful breakup and use of force against several thousand people protesting President Trump's attendance at a rally in 2017).

**Multi-party Civil Rights Cases:**

*Hospital and Service Employees Union, SEIU Local 399, AFL-CIO v. City of Los Angeles* (Los Angeles Superior Court) (a settlement in 1993 of \$2.35 million against the Los Angeles Police Department for injuries to 148 demonstrators at Century City organized by the Justice for Janitors campaign of SEIU);

*Rainey v. County of Ventura*, Case No.: 96 4492 LGB (C.D. Calif.)(action against County of Ventura for race discrimination on behalf of 12 police officers, settled for damages, structural relief and attorney's fees);

*Lawson v. City of Los Angeles*, Case No.: BC 031 232 (Los Angeles Superior Court)(lawsuit filed in 1991 on behalf of individuals who had been subjected to what plaintiffs alleged were unlawful use of force practices by the Los Angeles Police Department's Canine Unit, settled in 1995 for \$3.6 million and comprehensive structural relief);

*Tipton-Whittingham v. City of Los Angeles*, Case No.: CV-94-3240 (TH)(C.D. Cal.)(sex discrimination and harassment suit against the Los Angeles Police Department, involving over 25 individual officers, as a result of which the Department has already completely revamped its anti-discrimination policies and procedures; damages claims settled for \$4.85 Million in 2004 in addition to separate fee award of nearly \$2 Million in 2000 for injunctive relief, resulting in decision in *Tipton-Whittingham v. City of Los Angeles* (2004) 34 Cal.4th 604, in which the California Supreme Court upheld catalyst fees under California law);

*Hampton v. NRG* (racial harassment in employment claim; jury verdict of \$1,000,000 for two former employees, plus award of attorney's fees and costs; settled in mid-'90's while on appeal);

*Zuniga v. Los Angeles Housing Authority*, 41 Cal.App.4th 2 (1995) (holding that the Housing Authority could be held responsible for injuries to tenants after the Housing Authority was put on notice that tenants were being victimized on the premises and took no reasonable measures to prevent the injury; case settled for \$1,040,000);

*PIN v. HACLA*, Case No.: CV-96-2810 RAP (RNBx)(action against the Housing Authority of the City of Los Angeles on behalf of several hundred present or former tenants for discrimination by failing to provide adequate security for isolated minorities in housing developments, settled in 1998 for \$1.3 Million plus a comprehensive structural relief settlement agreement);

*Heidy v. United States Customs Serv.*, 681 F.Supp. 1445 (C.D.Cal. 1988) (injunction against U.S. Customs Service for policies and practices of seizing materials from persons traveling from Nicaragua in violation of the First Amendment);

*Castaneda v. Avol* (Los Angeles Superior Court) (1985) (action on behalf of approximately 350 slum housing residents, settled in 1988 for a comprehensive injunction and \$2.5 Million damages, plus a separate award of attorneys' fees).

### **Individual Civil Rights Cases: Wrongful Conviction Cases**

*Craig Coley v. City of Simi Valley* (wrongful conviction case of man imprisoned for 39 years for crime he did not commit; settled pre-filing for \$21 Million; case handled jointly with Neufeld, Scheck & Brustin, who are based in New York);

*Frank and Nicholas O'Connell v. County of Los Angeles, et al.*, Case No.: 13-01905-MWF (PJWx) (C.D. Cal.) (civil rights cases for police failure to turn over exculpatory information and eyewitness manipulation, resulting in murder conviction; plaintiff spent 27 years in prison before his habeas petition was granted, and he was not re-tried; suit on behalf of son as well for denial of relationship with father as result of conviction; defendants' qualified immunity appeal rejected in *Carrillo/O'Connell v. County of Los Angeles*; \$15 Million settlement);

*Thomas Goldstein v. City of Long Beach et al.*, Case No.: 04-CV-9692 AHM (Ex) (C.D. Cal.) (civil rights cases for police failure to turn over exculpatory information regarding jailhouse informant perjury and eyewitness manipulation, resulting in murder conviction; plaintiff spent 24 years in prison before his habeas petition was granted, and he was not re-tried; brought in mid-way through the case to act as lead counsel; final settlement of \$7.95 Million approved by the Court; Ninth Circuit recently reversed dismissal of County/DA's Office, and case against DA settled for additional \$900,000);

*Bruce Lisker v. City of Los Angeles*, Case No.: CV 09-9374 AHM (AJW) (C.D. Cal.) (civil rights cases for police fabrication of evidence and failure to turn over exculpatory information, resulting in murder conviction; plaintiff spent 26 years in prison before his habeas petition was granted, and he was not re-tried; 9<sup>th</sup> Circuit affirmed district court's denial of immunity on 3/20/15; petition for en banc review denied; \$7.6 Million settlement).



Consulting counsel in wrongful conviction cases of *Franky Carrillo v. County of Los Angeles*, CV 11-10310-SVW(AGRx) (settled for \$10.1 Million), *Obie Anthony v. City of Los Angeles*, CV 12-01332-CBM (AJWx) (settled for \$8.3 Million) and *v. County of Los Angeles*, CV 13-07224-CBM (AJWx) (settled for \$890,000 and reform of DA practices), and *Harold Hall v. City of Los Angeles*, C.D. Cal. No. CV 05-1977 ABC, 9th Cir. No. 10-55770 (appeal from grant of summary judgment to Defendants affirmed).

#### **Other Individual Civil Rights Cases:**

*McClure v. City of Los Angeles*, No.: CV-92-2776-E (C.D. Cal.) (fair housing and equal protection case against City of Long Beach and its agents for preventing six group homes for Alzheimer's victims from opening; jury verdict of \$22.5 Million (reduced on remittitur to \$13,826,832) plus approximately \$10,000,000 in attorney's fees and costs; settled while on appeal for \$20 Million);

*U.S. v. Hovsepien*, 359 F.3d 1144, 1147 (9<sup>th</sup> Cir. 2004) (en banc) (successful action to naturalize individuals previously convicted of conspiracy to bomb Turkish consulate in Philadelphia), aff'd en banc after remand, 422 F.3d 883 (9/6/05);

*Walker v. City of Lakewood*, 263 F.3d 1005 (9<sup>th</sup> Cir. 2001) (reversing district court decision dismissing fair housing organization's claim against city for retaliation for supporting tenants suing landlord; case subsequently settled for structural relief, damages and attorneys' fees);

*Tavelman v. City of Huntington Park* (individual employment discrimination case against the City on behalf of a Jewish police officer who had been subjected to a campaign of religious harassment which was settled in mi-'90's for \$350,000);

*Ware v. Brotman Medical Center* (Los Angeles Superior Court) (1993 \$2.5 million jury verdict against hospital for removal of hospital privileges of black doctor; settled for \$1.75 million);

*Mathis v. PG&E* (1991 \$2 million verdict against PG&E for barring contract employee from Diablo Canyon Nuclear Power Plant; reversed by the Ninth Circuit);

*Macias v. State of California* (Los Angeles Superior Court) (action against the State of California and others for blinding of young man as a result of exposure to malathion spray, a portion of which was decided in *Macias v. State of California*, 10 Cal.4th 844 (1994));

*Melgar v. Klee* (Los Angeles Superior Court) (1988) (\$1.5 million jury verdict against Los Angeles Police Department for police shooting; settled for \$1.45 million).

**Selected Civil Rights Decisions (from 1995 forward):**

*Aichele v. City of Los Angeles*, 2013 WL 2445195 (C.D. Cal. June 5, 2013);

*Amador v. Baca*, No. CV-10-1649 SVW, 2014 WL 10044904 (C.D. Cal. Dec. 18, 2014) (order certifying class [later decertified and then recertified]);

*Amador v. Baca*, No. CV 10-01649-SVW-JEM, 2017 WL 9472901 (C.D. Cal. June 7, 2017)(order granting summary judgment on liability to Plaintiffs on behalf of class of women inmates who were strip/visual body cavity searched without privacy);

*Biggs v. Best, Best & Krieger*, 189 F.3d 989 (9<sup>th</sup> Cir. 1999);

*Bynum v. Dist. of Columbia*, 384 F.Supp.2d 342 (D.D.C. 2005);

*Bynum v. District of Columbia*, 412 F.Supp.2d 73 (D.D.C. 2006);

*Carrillo v. Cty. of Los Angeles*, 798 F.3d 1210 (9<sup>th</sup> Cir. 2015);

*Chua v. City of Los Angeles*, No. LACV1600237JAKGJSX, 2017 WL 10776036 (C.D. Cal. May 25, 2017) (Order certifying class);

*Craft v. Cnty. of San Bernardino*, EDCV 05-359 -SGL, 2006 WL 4941829 (C.D. Cal. Mar. 23, 2006);

*Craft v. County of San Bernardino*, 468 F.Supp.2d 1172 (C.D.Cal. 2006);

*Craft v. Cnty. of San Bernardino*, 624 F. Supp. 2d 1113 (C.D. Cal. 2008);

*Goldstein v. City of Long Beach*, 603 F. Supp. 2d 1242 (C.D. Cal. 2009);

*Goldstein v. City of Long Beach*, CV 04-9692AHM, 2010 WL 3952888 (C.D. Cal. Apr. 9, 2010)

*Goldstein v. City of Long Beach*, 715 F.3d 750 (9th Cir. 2013)

*Haynie v. Superior Court*, 26 Cal.4th 1061 (Cal. S. Ct. 2001);

*Jones v. Murphy*, 256 F.R.D. 519 (D. Md. 2009)

*Jones v. Murphy*, 470 F.Supp.2d 537 (D.Md. 2007);

*Jones v. Murphy*, 567 F. Supp. 2d 787 (D. Md. 2008);

*West v. Murphy*, 771 F.3d 209 (4th Cir. 2014)

*Lisker v. City of Los Angeles*, CV 09-09374 AHM AJWX, 2011 WL 3420665 (C.D. Cal. Aug. 4, 2011);

*Lisker v. City of Los Angeles*, CV 09-09374 AHM AJWX, 2012 WL 3588560 (C.D. Cal. Aug. 20, 2012);

*Lisker v. City of Los Angeles*, 2:09-CV-09374-ODW, 2014 WL 293463 (C.D. Cal. Jan. 27, 2014)

*Lisker v. City of Los Angeles*, 780 F.3d 1237 (9th Cir. 2015)

*Lopez v. Youngblood*, 609 F.Supp.2d 1125 (E.D.Cal. 2009);

*Lopez v. Youngblood*, 2011 WL 10483569 (E.D. Cal. Sept. 2, 2011)

*Macias v. State of California*, 10 Cal.4th 844 (Cal. S. Ct. 1995).

*Mathis v. Pacific Gas and Elec. Co.*, 75 F.3d 498 (9<sup>th</sup> Cir. 1996);

*Multi-Ethnic Immigrant Workers Org. Network v. City of Los Angeles*, 2009 WL 1065072 (C.D. Cal. Mar. 19, 2009)

*Nozzi v. Hous. Auth. of City of Los Angeles*, 425 F. App'x 539, 540 (9th Cir. 2011)

*Nozzi v. Hous. Auth. of City of Los Angeles*, 806 F.3d 1178 (9th Cir. 2015),  
*as amended on denial of reh'g and reh'g en banc* (Jan. 29, 2016)

*Powell v. Barrett*, 376 F.Supp.2d 1340 (N.D.Ga. 2005);

*Powell v. Barrett*, 496 F.3d 1288 (11<sup>th</sup> Cir. 8/23/07)

*Powell v. Barrett*, 541 F.3d 1298 (11<sup>th</sup> Cir. 2008) (en banc) [overruling a portion of the preceding panel decision; after remand to the panel, remaining issues remanded to the District Court];

*Rodriguez v. Cty. of Los Angeles*, 96 F. Supp. 3d 1012 (C.D. Cal. 2014), *aff'd*, 891 F.3d 776 (9<sup>th</sup> Cir. 2018) (order awarding 5,378,174.66 in attorney's fees);

*Rodriguez v. Cty. of Los Angeles*, 891 F.3d 776, 784 (9<sup>th</sup> Cir. 2018) (upholding jury verdict for LASD inmates beaten in violation of the Eighth Amendment and attendant award of attorney's fees);

*Roy v. Cty. of Los Angeles*, No. CV1209012ABFFMX, 2018 WL 3435417 (C.D. Cal. July 11, 2018) (grant of motion to modify class definition);

*Roy v. Cty. of Los Angeles*, 114 F. Supp. 3d 1030, 1032 (C.D. Cal. 2015) (granting part and denying in part motion for judgment on the pleadings);

*Roy v. Cty. of Los Angeles*, No. CV1209012ABFFMX, 2018 WL 914773, at \*1 (C.D. Cal. Feb. 7, 2018), *reconsideration denied*, 2018 WL 3439168 (C.D. Cal. July 11, 2018) (order granting in part summary judgment on liability);

*Roy v. Cty. of Los Angeles*, No. CV1209012ABFFMX, 2018 WL 3436887 (C.D. Cal. July 11, 2018) (order denying decertification of class);

*Silva v. Block*, 49 Cal.App.4th 345 (1996);

*Streit v. County of Los Angeles*, 236 F.3d 552 (9<sup>th</sup> Cir. 2001);

*Tipton-Whittingham v. City of Los Angeles*, 316 F.3d 1058 (9<sup>th</sup> Cir. 2003);

*Tipton-Whittingham v. City of Los Angeles*, 34 Cal.4th 604 (2004);

*U.S. v. Hovsepian*, 359 F.3d 1144 (9<sup>th</sup> Cir. 2004) (en banc);

*U.S. v. Hovsepian*, 422 F.3d 883 (9<sup>th</sup> Cir. 2005) (en banc);

*Walker v. City of Lakewood*, 272 F.3d 1114 (9<sup>th</sup> Cir. 2001);

*Zuniga v. Housing Authority*, 41 Cal.App.4th 82 (1995);



## EXHIBIT B

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

**I. TABLE OF REPORTED ATTORNEYS' FEES – ORGANIZED BY CASE [SUPERSCRIPIT REFERENCES FOUND AT CONCLUSION OF THIS SECTION BEGINNING ON PG. 16]**

**A. Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks**

<b>Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks</b>						
<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>	
Hector O. Villagra <sup>1</sup>	ACLU	17 (1994)	\$600	2011	\$760	
Belinda Escobosa Helzer <sup>1</sup>	ACLU	11 (2000)	\$525	2011	\$665	
Peter Bibring <sup>1</sup>	ACLU	09 (2002)	\$490	2011	\$621	
Paralegal <sup>1</sup>	ACLU		\$200	2011	\$253	
Joseph J. Ybarra <sup>1</sup>	MTO**	10 (2001)	\$550	2011	\$697	
Jacob A. Kreilkamp <sup>1</sup>	MTO**	08 (2003)	\$505	2011	\$640	
Laura D. Smolowe <sup>1</sup>	MTO**	05 (2006)	\$460	2011	\$583	
Marina A. Torres <sup>1</sup>	MTO**	03 (2008)	\$385	2011	\$488	
Sarala V. Nagala <sup>1</sup>	MTO**	03 (2008)	\$385	2011	\$488	
Paralegal <sup>1</sup>	MTO**		\$210	2011	\$266	
ALS <sup>1</sup>	MTO**		\$250	2011	\$317	
Carol Sobel <sup>2</sup>	Law Ofc Carol Sobel	31 (1978)	\$710	2009	\$954	
Mark Rosenbaum <sup>2</sup>	ACLU	35 (1974)	\$740	2009	\$994	
Peter Eliasberg <sup>2</sup>	ACLU	15 (1994)	\$525	2009	\$706	

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Peter Bibring <sup>2</sup>	ACLU	07 (2002)	\$375	2009	\$504
Anne Richardson <sup>2</sup>	HSKRRR****	20 (1989)	\$575	2009	\$773
Sanjukta Paul <sup>2</sup>	HSKRRR****	06 (2003)	\$350	2009	\$470
James de Simone <sup>3</sup>	Schonbrun, de Simon	27 (1985)	\$695	2012	\$855
Michael Seplow <sup>3</sup>	Schonbrun, de Simon	22 (1990)	\$630	2012	\$775
Anna Canning <sup>3</sup>	Schonbrun, de Simon	06 (2006)	\$450	2012	\$553
Law student interns <sup>3</sup>	Schonbrun, de Simon		\$200	2012	\$246
Sid Wolinsky <sup>4</sup>	DRA*	49 (1961)	\$835	2010	\$1,089
Laurence Paradis <sup>4</sup>	DRA*	26 (1985)	\$730	2010	\$952
Melissa Kasnitz <sup>4</sup>	DRA*	18 (1992)	\$650	2010	\$848
Jennifer Bezoza <sup>4</sup>	DRA*	10 (2000)	\$570	2010	\$744
Roger Heller <sup>4</sup>	DRA*	09 (2001)	\$560	2010	\$731
Kevin Knestrick <sup>4</sup>	DRA*	07 (2003)	\$535	2010	\$698
Kasey Corbit <sup>4</sup>	DRA*	06 (2004)	\$500	2010	\$652
Mary-Lee Kimber <sup>4</sup>	DRA*	05 (2005)	\$475	2010	\$620
Stephanie Biedermann <sup>4</sup>	DRA*	03 (2007)	\$350	2010	\$457
Becca von Behren <sup>4</sup>	DRA*	02 (2008)	\$265	2010	\$346
Senior paralegals <sup>4</sup>	DRA*		\$265	2010	\$346
Paralegals <sup>4</sup>	DRA*		\$225	2010	\$294
Summer associates <sup>4</sup>	DRA*		\$245	2010	\$320
Law clerks <sup>4</sup>	DRA*		\$175	2010	\$228
Case clerks <sup>4</sup>	DRA*		\$165	2010	\$215
Daniel B. Kohrman <sup>4</sup>	AFL*****	26 (1984)	\$740	2010	\$966
Julie Nepveu <sup>4</sup>	AFL*****	19 (1991)	\$660	2010	\$861

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Jose R. Allen <sup>4</sup>	Skadden Arps	25 (1985)	\$930	2010	\$1,213
Sheryl Wu Leung <sup>4</sup>	Skadden Arps	05 (2005)	\$395	2010	\$515
Nathaniel Fisher <sup>4</sup>	Skadden Arps	02 (2008)	\$530	2010	\$692
Legal assistant <sup>4</sup>	Skadden Arps		\$285	2010	\$372
Technology manager <sup>4</sup>	Skadden Arps		\$320	2010	\$418
Ben Schonbrun <sup>5</sup>	Schonbrun, de Simone	25 (1985)	\$650	2010	\$848
Michael Seplow <sup>5</sup>	Schonbrun, de Simone	20 (1990)	\$590	2010	\$770
John Raphling <sup>5</sup>	Schonbrun, de Simone	17 (1993)	\$525	2010	\$685
Barrett S. Litt <sup>6</sup>	Litt, Estuar & Kitson	40 (1969)	\$800	2009	\$1,075
Carol A. Sobel <sup>6</sup>	Law Offices of Carol Sobel	31 (1978)	\$710	2009	\$954
Rebecca Thornton <sup>6</sup>	Law Offices of Carol Sobel	08 (2001)	\$425	2009	\$571
Paul L. Hoffman <sup>6</sup>	Schonbrun, de Simone	33 (1976)	\$750	2009	\$1,008
Barrett S. Litt <sup>7</sup>	Litt, Estuar & Kitson	38 (1969)	\$725	2007	\$1,034
Paul Estuar <sup>7</sup>	Litt, Estuar & Kitson	14 (1993)	\$485	2007	\$691
Stacey Brown <sup>7</sup>	Litt, Estuar & Kitson	01 (2006)	\$275	2007	\$392
Senior Paralegals <sup>7</sup>	Litt, Estuar & Kitson		\$225	2007	\$321
Barrett S. Litt <sup>8</sup>	Litt, Estuar & Kitson	43 (1969)	\$850	2012	\$1,045
Robert M. Kitson <sup>8</sup>	Litt, Estuar & Kitson	17 (1995)	\$625	2012	\$769
Bryan M. Miller <sup>8</sup>	Litt, Estuar & Kitson	18 (1994)	\$625	2012	\$769
Sr. paralegal <sup>8</sup>	Litt, Estuar & Kitson		\$250	2012	\$307
Law student interns <sup>8</sup>	Litt, Estuar & Kitson		\$225	2012	\$277
Dan Stormer <sup>8</sup>	HSKRR****	38 (1974)	\$825	2012	\$1,015
Michael Bien <sup>9</sup>	Rosen Bien Galvan & Grunfeld	28 (2008)	\$640	2008	\$886
Unnamed <sup>10</sup>	Prison Law Office	01 (2009)	\$275	2010	\$359



**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Unnamed <sup>10</sup>	Prison Law Office	32 (1978)	\$700	2010	\$913
Unnamed <sup>10</sup>	Rosen Bien & Galvan	48 (1962)	\$800	2010	\$1,044
Unnamed <sup>10</sup>	Rosen Bien & Galvan	13 (1997)	\$560	2010	\$731
St. paralegal <sup>10</sup>	Rosen Bien & Galvan		\$240	2010	\$313
Unnamed <sup>10</sup>	Bingham, McCutcheon	32 (1978)	\$700	2010	\$913
Unnamed <sup>10</sup>	Bingham, McCutcheon	02 (2008)	\$400	2010	\$522
Unnamed <sup>10</sup>	Bingham, McCutcheon	13 (1997)	\$655	2010	\$855
John Houston Scott <sup>11</sup>	Scott Law Firm	37 (1976)	\$725	2013	\$866
Thomas P. Greerty <sup>11</sup>	Law Offices of Thomas P. Greerty	34 (1979)	\$725	2013	\$866
Amitai Schwartz <sup>11</sup>	Law Offices of Amitai Schwartz	40 (1973)	\$725	2013	\$866
Moira Duvernay <sup>11</sup>	Law Offices of Amitai Schwartz	09 (2004)	\$450	2013	\$537
Sanford J. Rosen <sup>12</sup>	Rosen Bien & Galvan	46 (1962)	\$700	2008	\$969
Sid Wolinsky <sup>13</sup>	DRA *	51 (1961)	\$860	2012	\$1,058
Shawna Parks <sup>13</sup>	DRA *	13 (1999)	\$665	2012	\$818
Mary-Lee Smith <sup>13</sup>	DRA *	07 (2005)	\$555	2012	\$683
Karla Gilbride <sup>13</sup>	DRA *	05 (2007)	\$430	2012	\$529
Larry Paradis <sup>13</sup>	DRA *	27 (1985)	\$800	2012	\$984
Ron Elsberry <sup>13</sup>	DRA *	25 (1987)	\$725	2012	\$892
Katherine Weed <sup>13</sup>	DRA *	10 (2002)	\$600	2012	\$738
Stephanie Biedermann <sup>13</sup>	DRA *	05 (2007)	\$430	2012	\$529
Christine Chuang <sup>13</sup>	DRA *	05 (2007)	\$430	2012	\$529

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Kara Janssen <sup>13</sup>	DRA *	02 (2010)	\$330	2012	\$406
Paralegal	DRA *		\$240	2012	\$307
Summer Associates <sup>13</sup>	DRA *		\$250	2012	\$295
Michelle Uzeta <sup>13</sup>	DRLC***	20 (1992)	\$700	2012	\$861
Debra Patkin <sup>13</sup>	DRLC***	05 (2007)	\$450	2012	\$553
Jennifer Lee <sup>13</sup>	DRLC***	09 (2003)	\$550	2012	\$676
Matthew Strugar <sup>13</sup>	DRLC***	08 (2004)	\$525	2012	\$646
Law Clerk <sup>13</sup>	DRLC***		\$230	2012	\$283
Litigation Assist <sup>13</sup>	DRLC***		\$230	2012	\$283
Shawna Parks <sup>14</sup>	DRLC	10 (1999)	\$525	2009	\$706
Sage Reeves <sup>14</sup>	DRLC	08 (2001)	\$475	2009	\$638
Matthew Strugar <sup>14</sup>	DRLC	05 (2004)	\$400	2009	\$538
Bethany Woodard <sup>14</sup>	MTO**	04 (2005)	\$395	2009	\$531
Kristina Wilson <sup>14</sup>	MTO**	03 (2006)	\$350	2009	\$470
Robert Dell Angelo <sup>14</sup>	MTO**	17 (1992)	\$550	2009	\$739
Law Clerks <sup>14</sup>	MTO**		\$220	2009	\$296
Barrett S. Litt <sup>15</sup>	Litt, Estuar & Kitson	39 (1969)	\$750	2008	\$1,038
Earnest Bell <sup>15</sup>	Law Offices of Earnest Bell	20 (1988)	\$600	2008	\$831
Sr. Paralegal <sup>15</sup>	Litt, Estuar & Kitson		\$235	2008	\$325
Dale Galipo <sup>16</sup>	Law Ofc of Dale Galipo	23 (1989)	\$700	2012	\$861
Humberto Guizar <sup>16</sup>		26 (1986)	\$500	2012	\$615
Matthew McNicholas <sup>17</sup>	McNicholas & McNicholas	15 (1997)	\$700	2012	\$861
Douglas D. Winter <sup>17</sup>	McNicholas & McNicholas	22 (1990)	\$600	2012	\$738
Catherine Schmidt <sup>17</sup>	McNicholas & McNicholas	11 (2001)	\$500	2012	\$615

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

Attorney	Firm	Pract Yrs (Grad Yr)	Rate	Year	Adjusted Rate
Bill Lann Lee <sup>18</sup>	Lewis, Feinberg, Lee, Renaker, & Jackson	38 (1974)	\$825	2012	\$1,015
Matthew Righetti <sup>19</sup>	Righetti Glugoski	27 (1985)	\$750	2012	\$922
John Glugoski <sup>19</sup>	Righetti Glugoski	12 (1997)	\$650	2012	\$799
Angela Padilla <sup>20</sup>	MoFo	15 (1991)	\$600	2006	\$881
Mahogany Jenkins <sup>20</sup>	MoFo	02 (2004)	\$285	2006	\$419
Robert Rubin <sup>20</sup>	LCCR	28 (1978)	\$625	2006	\$918
Paralegal <sup>20</sup>	MoFo		\$175	2006	\$257
Carol Sobel <sup>21</sup>	Law Office of Carol Sobel	32 (1978)	\$725	2010	\$946
Rebecca Thornton <sup>21</sup>	Law Office of Carol Sobel	09 (2001)	\$450	2010	\$587
Heather McGunigle <sup>22</sup>	DRLC	04 (2009)	\$375	2009	\$504
Todd Burns <sup>23</sup>	Law Office of Todd Burns	18 (1996)	\$650	2014	\$754
Scott A. Brooks <sup>24</sup>	Daniels, Fine, Israel, Schonbuch & Lebovits	19 (1992)	\$650	2011	\$823
Paul R. Fine <sup>24</sup>	Daniels, Fine, Israel, Schonbuch & Lebovits	39 (1972)	\$850	2011	\$1,077
Craig Momita <sup>24</sup>	Daniels, Fine, Israel, Schonbuch & Lebovits	18 (1993)	\$400	2011	\$507
Stephen Glick <sup>24</sup>	Law Offices of Stephen Glick	37 (1974)	\$800	2011	\$1,013
Ian Herzog <sup>24</sup>	Law Office of Ian Herzog	44 (1967)	\$1,000	2011	\$1,267
Susan Abitanta <sup>24</sup>	Law Office of Ian Herzog	28 (1983)	\$600	2011	\$760
Rebecca Grey <sup>25</sup>		16 (1998)	\$650	2014	\$754
Dale Galipo <sup>26</sup>	Law Ofc Dale Galipo	24 (1989)	\$675	2013	\$806
Michael Haddad <sup>27</sup>	Haddad & Sherwin	23 91991)	\$725	2014	\$840

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Julia Sherwin <sup>27</sup>	Haddad & Sherwin	19 (1995)	\$695	2014	\$806
Richard Pearl <sup>27</sup>		44 (1970)	\$750	2014	\$869
Genevieve Guertin <sup>27</sup>	Haddad & Sherwin	05 (2009)	\$400	2014	\$464
Gina Altomare <sup>27</sup>	Haddad & Sherwin	04 (2010)	\$350	2014	\$406
Thomas Kennedy Helm <sup>27</sup>	Haddad & Sherwin	02 (2012)	\$325	2014	\$377
Paralegals (not senior) <sup>27</sup>	Haddad & Sherwin		\$200	2014	\$232
Jim DeSimone <sup>28</sup>	Schonbrun, de Simone	28 (1985)	\$725	2013	\$866
Michael Seplow <sup>28</sup>	Schonbrun, de Simone	23 (1990)	\$660	2013	\$788
Douglas Ingraham <sup>28</sup>	Schonbrun, de Simone	15 (1998)	\$575	2013	\$687
Christopher Cox <sup>29</sup>	Weill Gotschall	23 (1991)	\$850	2014	\$985
Bambo Obarro <sup>29</sup>	Weill Gotschall	04 (2010)	\$400	2014	\$464
Ronald K. Tellis <sup>30</sup>	Baron & Budd	18 (1996)	\$775	2014	\$898
Timothy G. Blood <sup>30</sup>	Blood Hurst and O'Reardon	24 (1990)	\$695	2014	\$806
Gene J. Stonebarger <sup>31</sup>	Stonebarger Law, APC	14 (2000)	\$650	2014	\$754
Richard D. Lambert <sup>31</sup>	Stonebarger Law	07 (2007)	\$500	2014	\$580
Dale Galipo <sup>32</sup>	Law Ofc Dale Galipo	25 (1989)	\$800	2014	\$927
Dale Galipo <sup>33</sup>	Law Ofc Dale Galipo	25 (1989)	\$800	2014	\$927
Barrett S. Litt <sup>34</sup>	KMBL	45 (19690)	\$975	2014	\$1,130
Ronald O. Kaye <sup>34</sup>	KMBL	25 (1989)	\$775	2014	\$898
David M. McLane <sup>34</sup>	KMBL	28 (1988)	\$775	2014	\$898
Kevin LaHue <sup>34</sup>	KMBL	10 (2004)	\$600	2014	\$696
Caitlin Weisberg <sup>34</sup>	KMBL	06 (2008)	\$500	2014	\$580



**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Julia White <sup>34</sup> [Sr. Paralegal]	KMBL		\$295	2014	\$342
Heath White <sup>34</sup> [High Tech Paralegal]	KMBL		\$235	2014	\$272
Jose R. Allen <sup>35</sup>	Skadden, Arps	31 (1985)	\$1150	2016	\$1,257
Guy Wallace <sup>35</sup>	Schneider Wallace	23 (1993)	\$750	2016	\$820
David Borgen <sup>35</sup>	Goldstein Borgen Dardarian	35 (1981)	\$795	2016	\$869
Linda Dardarian <sup>35</sup>	Goldstein Borgen Dardarian	29 (1987)	\$775	2016	\$847
Shawna Parks <sup>35</sup>	Law Ofc Shawna Parks	17 (1999)	\$695	2016	\$759
Brian Dunn <sup>36</sup>	Cochran Firm	21 (1995)	\$750	2016	\$820
Paula Pearlman <sup>37</sup>	DRLC	35 (1982)	\$875	2017	\$928
Shawna Parks <sup>37</sup>	DRLC	18 (1999)	\$745	2017	\$790
Maronel Barajas <sup>37</sup>	DRLC	14 (2003)	\$675	2017	\$716
Matthew Stugar <sup>37</sup>	DRLC	13 (2004)	\$660	2017	\$700
Umbreen Bhatti <sup>37</sup>	DRLC	12 (2005)	\$640	2017	\$679
Carly Munson <sup>37</sup>	DRLC	11 (2006)	\$625	2017	\$663
Andrea Oxman <sup>37</sup>	DRLC	10 (2007)	\$600	2017	\$637
Elliot Field <sup>37</sup>	DRLC	08 (2009)	\$525	2017	\$557
Law Clerks <sup>37</sup>	DRLC		\$250	2017	\$265
Barrett S. Litt <sup>38</sup>	KMBL	49 (1969)	\$1,150	2017	\$1,220
Pat Dunlevy <sup>38</sup>	KMBL	26 (1992)	\$750	2017	\$796
Paul Estuar <sup>38</sup>	KMBL	25 (1993)	\$765	2017	\$812
Paul Hughes <sup>38</sup>	Mayer, Brown	10 (2008)	\$730	2017	\$774

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Julia White <sup>38</sup> [Sr. Paralegal]	KMBL		\$335	2017	\$355
Anne Richardson <sup>38</sup>	Public Counsel	29 (1989)	\$850	2017	\$902
Patrick Dunlevy <sup>38</sup>	Public Counsel	26 (1992)	\$750	2017	\$796
Lisa Jaskol <sup>38</sup>	Public Counsel	30 (1988)	\$850	2017	\$902
Hernan Vera <sup>38</sup>	Public Counsel	24 (1994)	\$750	2017	\$796
Stephanie Carroll <sup>38</sup>	Public Counsel	14 (2004)	\$640	2017	\$679
Adelaide Anderson <sup>38</sup>	Public Counsel	8 (2010)	\$540	2017	\$573
Jackie Chidiac <sup>38</sup> [Paralegal]	Public Counsel		\$200	2017	\$212
Maria Cabadas <sup>38</sup> [Litigation Coordinator]	Public Counsel		\$190	2017	\$202
Paula Pearlman <sup>39</sup>	DRLC	35 (1982)	\$875	2017	\$928
Barrett S. Lit <sup>40</sup>	KMBL	49 (1969)	\$1,150	2018	\$1,185
David M. McLane <sup>40</sup>	KMBL	32 (1986)	\$875	2018	\$901
Ronald O. Kaye <sup>40</sup>	KMBL	30 (1988)	\$875	2018	\$901
Lindsay Battles <sup>40</sup>	KMBL	10 (2008)	\$600	2018	\$618
Melissa Goodman <sup>40</sup>	ACLU	15 (2003)	\$715	2018	\$736
Amanda Goad <sup>40</sup>	ACLU	13 (2005)	\$640	2018	\$659
Brendan Hamme <sup>40</sup>	ACLU	06 (2012)	\$480	2018	\$494
Tasha Hill <sup>40</sup>	ACLU	04 (2014)	\$390	2018	\$402
Aditi Fruitwala <sup>40</sup>	ACLU	04 (2014)	\$390	2018	\$402
Julia White <sup>40</sup> [Sr. Paralegal]	KMBL		\$335	2018	\$345

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Diana Gonzalez <sup>40</sup> [Paralegal]	ACLU		\$195	2018	\$201
Rene Arriaza <sup>40</sup> [Paralegal]	KMBL		\$175	2018	\$180
Sujata Awasthi <sup>40</sup> [Law Clerk]	ACLU		\$225	2018	\$232
Evan Ettinghoff <sup>40</sup> [Law Clerk]	KMBL		\$225	2018	\$232

**B. Table 2: Consumer/Wage & Hour Class Action Lodestar Crosschecks**

<b>Table 2: Consumer/Wage &amp; Hour Class Action Lodestar Crosschecks</b>					
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Guy Wallace <sup>51</sup>	Schneider Wallace	17 (1993)	\$650	2010	\$848
Josh Konecky <sup>51</sup>	Schneider Wallace	14 (1996)	\$625	2010	\$815
Jonathan E. Gertler <sup>52</sup>	Chavez & Gertler	31 (1983)	\$725	2013	\$866
Dan L. Gildor <sup>52</sup>	Chavez & Gertler	12 (2002)	\$550	2013	\$657
Patrick N. Keegan <sup>53</sup>	Keegan & Baker LLP	20 (1993)	\$695	2013	\$830
Todd Schneider <sup>54</sup>	Schneider Wallace	29 (1982)	\$675	2011	\$855
Eric Gibbs <sup>55</sup>	Girard Gibbs	15 (1995)	\$675	2010	\$881
Dylan Hughes <sup>55</sup>	Girard Gibbs	10 (2000)	\$545	2010	\$711
Eric Gibbs <sup>56</sup>	Girard Gibbs	15 (1995)	\$675	2010	\$881
Jonathan Selbin <sup>57</sup>	Lieff Cabraser	16 [1993]	\$600	2009	\$806

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 2: Consumer/Wage &amp; Hour Class Action Lodestar Crosschecks</b>					
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Shawn Khorrami <sup>58</sup>	Khorrami Boucher Sumner Sanguinetti, LLP	19 (1995)	\$650	2014	\$754
Launa Adolph <sup>58</sup>	Khorrami Boucher Sumner Sanguinetti, LLP	11 (2003)	\$495	2014	\$574
Paul Kiesel <sup>59</sup>	Kiesel Law LLP	30 [1985]	\$1,100	2015	\$1,238
Jeffrey A. Koncius <sup>59</sup>	Kiesel Law LLP	18 [1997]	\$625	2015	\$703
Matthew A. Young <sup>59</sup>	Kiesel Law LLP	06 [2009]	\$375	2015	\$422
Eric L. Cramer <sup>60</sup>	Berger Montague	22 (1990)	\$900	2015	\$1,013
Daniel Girard <sup>60</sup>	Girard Gibbs	31 (1984)	\$845	2015	\$951
Amanda Steiner <sup>60</sup>	Girard Gibbs	18 (1997)	\$650	2015	\$732
Kelly Dermody <sup>60</sup>	Leiff Cabraser Heimann & Bernstein	21 (1994)	\$800	2015	\$900
Richard Heimann <sup>60</sup>	Leiff Cabraser Heimann & Bernstein	40 (1975)	\$900	2015	\$1,013

**C. Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports**



**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports</b>					
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Unnamed <sup>11</sup>	Arnold & Porter	39 (1974)	\$910	2013	\$1,087
Unnamed <sup>11</sup>	Arnold & Porter	09 (2004)	\$625	2013	\$746
Unnamed <sup>11</sup>	Quinn Emanuel		\$821	2013	\$980
Unnamed <sup>11</sup>	Quinn Emanuel		\$448	2013	\$535
Unnamed <sup>11</sup>	Quinn Emanuel	20	\$700	2013	\$836
Diane Hutnyan <sup>81</sup>	Quinn Emanuel	15 (1997)	\$790	2012	\$972
Victoria Maroulis <sup>81</sup>	Quinn Emanuel	13 (1999)	\$815	2012	\$1,002
Todd Briggs <sup>81</sup>	Quinn Emanuel	12 (2000)	\$735	2012	\$904
Marc Becker <sup>81</sup>	Quinn Emanuel	24 (1988)	\$1035	2012	\$1,273
Melissa Dalziel <sup>81</sup>	Quinn Emanuel	12 (2000)	\$730	2012	\$898
Thomas J. Nolan <sup>82</sup>	Skadden Arps	40 (1971)	\$1095	2011	\$1,387
Jason D. Russell <sup>82</sup>	Skadden Arps	18 (1993)	\$1030	2011	\$1,305
Hillary A. Hamilton <sup>82</sup>	Skadden Arps	10 (2001)	\$710	2011	\$899
Legal Assistant <sup>82</sup>	Skadden Arps		\$295	2011	\$374
Arturo Gonzalez <sup>83</sup>	MoFo	28 (1985)	\$950	2013	\$1,134
Suzantha Brickman <sup>83</sup>	MoFo	07 (2006)	\$650	2013	\$776
Unnamed <sup>84</sup>	Lieff Cabraser	01 (2011)	\$325	2012	\$400
Unnamed <sup>84</sup>	Lieff Cabraser	04 (2008)	\$395	2012	\$486
Unnamed <sup>84</sup>	Lieff Cabraser	06 (2006)	\$435	2012	\$535
Unnamed <sup>84</sup>	Lieff Cabraser	11 (2001)	\$525	2012	\$646
Unnamed <sup>84</sup>	Lieff Cabraser	14 (1998)	\$585	2012	\$719
Unnamed <sup>84</sup>	Lieff Cabraser	17 (1995)	\$650	2012	\$799
Unnamed <sup>84</sup>	Lieff Cabraser	21 (1991)	\$700	2012	\$861

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports</b>					
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Unnamed <sup>84</sup>	Lieff Cabraser	24 (1988)	\$775	2012	\$953
Unnamed <sup>84</sup>	Lieff Cabraser	29 (1983)	\$775	2012	\$953
Unnamed <sup>84</sup>	Lieff Cabraser	34 (1978)	\$800	2012	\$984
Unnamed <sup>84</sup>	Lieff Cabraser	38 (1974)	\$900	2012	\$1,107
Unnamed <sup>84</sup>	Lieff Cabraser	42 (1970)	\$900	2012	\$1,107
Unnamed <sup>85</sup>	Paul Hastings	01 (2010)	\$360	2011	\$456
Unnamed <sup>85</sup>	Paul Hastings	03 (2008)	\$450	2011	\$570
Unnamed <sup>85</sup>	Paul Hastings	04 (2007)	\$500	2011	\$633
Unnamed <sup>85</sup>	Paul Hastings	05 (2006)	\$530	2011	\$671
Unnamed <sup>85</sup>	Paul Hastings	06 (2005)	\$565	2011	\$716
Unnamed <sup>85</sup>	Paul Hastings	07 (2004)	\$590	2011	\$747
Unnamed <sup>85</sup>	Paul Hastings	08 (2003)	\$620	2011	\$785
Unnamed <sup>85</sup>	Paul Hastings	09 (2002)	\$630	2011	\$798
Unnamed <sup>85</sup>	Paul Hastings	12 (1999)	\$670	2011	\$849
Unnamed <sup>85</sup>	Paul Hastings	15 (1996)	\$725	2011	\$918
Unnamed <sup>85</sup>	Paul Hastings	17 (1994)	\$725	2011	\$918
Unnamed <sup>85</sup>	Paul Hastings	23 (1998)	\$850	2011	\$1,077
Unnamed <sup>85</sup>	Paul Hastings	33 (1978)	\$940	2011	\$1,191
Wayne Barsky <sup>86</sup>	Gibson Dunn	26 (1983)	\$905	2009	\$1,216
Marcellus McRae <sup>86</sup>	Gibson Dunn	21 (1988)	\$785	2009	\$1,055
Daniel Kolkey <sup>86</sup>	Gibson Dunn	32 (1977)	\$840	2009	\$1,129
Danielle Katzi <sup>86</sup>	Gibson Dunn	05 (2004)	\$525	2009	\$706
Multiple associates <sup>86</sup>	Gibson Dunn	04 (2005)	\$495	2009	\$665

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports</b>					
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Melissa Barshop <sup>86</sup>	Gibson Dunn	03 (2006)	\$470	2009	\$632
Multiple associates <sup>86</sup>	Gibson Dunn	02 (2007)	\$400	2009	\$538
Multiple associates <sup>86</sup>	Gibson Dunn	01 (2008)	\$345	2009	\$464
Paralegal <sup>86</sup>	Gibson Dunn		\$300	2009	\$403
Paralegal <sup>86</sup>	Gibson Dunn		\$295	2009	\$396
Paralegal <sup>86</sup>	Gibson Dunn		\$315	2009	\$423
Danielle Gilmore <sup>87</sup>	Quinn Emanuel	15 (1993)	\$685	2008	\$948
Sara Brenner <sup>87</sup>	Quinn Emanuel	02 (2006)	\$340	2008	\$471
Paralegal <sup>87</sup>	Quinn Emanuel		\$235	2008	\$325
Mark D. Kemple <sup>88</sup>	Greenberg Traurig	20 (1989)	\$675	2009	\$934
Erik Swanholt <sup>88</sup>	Greenberg Traurig	11 (1998)	\$575	2009	\$796
Hirad Dadgostar <sup>88</sup>	Greenberg Traurig	03 (2006)	\$400	2008	\$554
Brian J. Hennigan <sup>89</sup>	Irell & Manella	25 (1983)	\$775	2008	\$1,073
Michal H. Strub <sup>89</sup>	Irell & Manella	18 (1990)	\$670	2008	\$927
Kimberly A. Svendsen <sup>89</sup>	Irell & Manella	04 (2004)	\$410	2008	\$568
Dena G. Kaplan <sup>89</sup>	Irell & Manella	05 (2003)	\$475	2008	\$658
Gordon Kirscher <sup>90</sup>	O'Melveny & Myers	38 (1971)	\$860	2009	\$1,156
Alejandro Mayorkas <sup>90</sup>	O'Melveny & Myers	23 (1986)	\$770	2009	\$1,035
Thomas M. Riordan <sup>90</sup>	O'Melveny & Myers	14 (1995)	\$675	2009	\$907
Jorge DeNeve <sup>90</sup>	O'Melveny & Myers	10 (1998)	\$620	2009	\$833
Allan Johnson <sup>90</sup>	O'Melveny & Myers	08 (2001)	\$565	2009	\$759
Abby Schwartz <sup>90</sup>	O'Melveny & Myers	03 (2006)	\$450	2009	\$605

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS  
ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports</b>					
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Paralegal <sup>90</sup>	O'Melveny &Myers	17 (2004)	\$310	2009	\$417
Paralegal <sup>90</sup>	O'Melveny &Myers	05 (2004)	\$225	2009	\$302
Paralegal <sup>90</sup>	O'Melveny &Myers	12 (1997)	\$245	2009	\$329
Unnamed <sup>91</sup>	Paul Hastings	36 (1974)	\$940	2010	\$1,226
Unnamed <sup>91</sup>	Paul Hastings	16 (1994)	\$725	2010	\$946
Unnamed <sup>91</sup>	Paul Hastings	11 (1999)	\$670	2010	\$874
Unnamed <sup>91</sup>	Paul Hastings	10 (2000)	\$660	2010	\$861
Sr. Paralegal <sup>91</sup>	Paul Hastings		\$330	2010	\$431
Unnamed <sup>92</sup>	White & Case	04 (2004)	\$600	2009	\$806
Unnamed <sup>92</sup>	White & Case	06 (2003)	\$600	2009	\$806
Unnamed <sup>92</sup>	White & Case	08 (2001)	\$655	2009	\$880
Unnamed <sup>92</sup>	White & Case	24 (1985)	\$750	2009	\$1,008
Unnamed <sup>92</sup>	Weil, Gotscahl & Manges	01 (2008)	\$355	2009	\$477
Unnamed <sup>92</sup>	Weil, Gotscahl & Manges	03 (2006)	\$465	2009	\$625
Unnamed <sup>92</sup>	Weil, Gotscahl & Manges	04 (2005)	\$500	2009	\$672
Unnamed <sup>92</sup>	Weil, Gotscahl & Manges	06 (2003)	\$580	2009	\$779
Unnamed <sup>92</sup>	Weil, Gotscahl & Manges	23 (1986)	\$799	2009	\$1,074
Unnamed <sup>92</sup>	Pachulski, Stang et al.	14 (1995)	\$535	2009	\$719



**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports</b>					
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Unnamed <sup>92</sup>	Pachulski, Stang et al.	20 (1989)	\$645	2009	\$867
Unnamed <sup>92</sup>	Pachulski, Stang et al.	22 (1987)	\$725	2009	\$974
Unnamed <sup>92</sup>	Pachulski, Stang et al.	24 (1985)	\$675	2009	\$907
Unnamed <sup>92</sup>	Pachulski, Stang et al.	27 (1982)	\$750	2009	\$1,008
Unnamed <sup>92</sup>	Pachulski, Stang et al.	32 (1977)	\$650	2009	\$874
Unnamed <sup>92</sup>	O'Melveny & Myers	03 (2006)	\$395	2009	\$531
Unnamed <sup>92</sup>	O'Melveny & Myers	34 (1975)	\$860	2009	\$1,156
Unnamed <sup>92</sup>	Munger, Tolles & Olson	03 (2006)	\$400	2009	\$538
Unnamed <sup>92</sup>	Munger, Tolles & Olson	04 (2005)	\$450	2009	\$605
Unnamed <sup>92</sup>	Munger, Tolles & Olson	04 (2005)	\$435	2009	\$585
Unnamed <sup>92</sup>	Munger, Tolles & Olson	04 (2004)	\$395	2009	\$531
Unnamed <sup>92</sup>	Munger, Tolles & Olson	12 (1997)	\$525	2009	\$706
Unnamed <sup>92</sup>	Munger, Tolles & Olson	21 (1988)	\$600	2009	\$806
Unnamed <sup>92</sup>	Munger, Tolles & Olson	22 (1987)	\$725	2009	\$974
Unnamed <sup>92</sup>	Munger, Tolles & Olson	25 (1984)	\$550	2009	\$739

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports</b>					
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Unnamed <sup>92</sup>	Munger, Tolles & Olson	39 (1970)	\$625	2009	\$840
Unnamed <sup>92</sup>	Morrison & Foerster	24 (1985)	\$750	2009	\$1,008
Unnamed <sup>92</sup>	Morrison & Foerster	09 (2000)	\$535	2009	\$719
Unnamed <sup>92</sup>	Morrison & Foerster	17 (1992)	\$650	2009	\$874
Unnamed <sup>92</sup>	Klee, Tuchin, Bogdanoff, & Stern	12 (1997)	\$650	2009	\$874
Unnamed <sup>92</sup>	Klee, Tuchin, Bogdanoff, & Stern	18 (1991)	\$590	2009	\$793
Unnamed <sup>92</sup>	Klee, Tuchin, Bogdanoff, & Stern	19 (1990)	\$850	2009	\$1,142
Unnamed <sup>92</sup>	Hennigan, Bennett & Dorman	09 (2000)	\$505	2009	\$679
Unnamed <sup>92</sup>	Hennigan, Bennett & Dorman	30 (1979)	\$760	2009	\$1,021
Unnamed <sup>92</sup>	Hennigan, Bennett & Dorman	31 (1978)	\$680	2009	\$914
Unnamed <sup>92</sup>	Gibson Dunn & Crutcher	03 (2006)	\$470	2009	\$632
Unnamed <sup>92</sup>	Gibson Dunn & Crutcher	06 (2003)	\$570	2009	\$766
Unnamed <sup>92</sup>	Gibson Dunn & Crutcher	12 (1997)	\$635	2009	\$853

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports</b>						
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>	
Unnamed <sup>92</sup>	Gibson Dunn & Crutcher	15 (1994)	\$525	2009	\$706	
Unnamed <sup>92</sup>	Gibson Dunn & Crutcher	18 (1991)	\$610	2009	\$820	
Unnamed <sup>92</sup>	Gibson Dunn & Crutcher	25 (1974)	\$790	2009	\$1,062	
Unnamed <sup>92</sup>	Davis, Polk & Wardwell	04 (2005)	\$680	2009	\$914	
Unnamed <sup>92</sup>	Davis, Polk & Wardwell	19 (1990)	\$955	2009	\$1,283	
Unnamed <sup>92</sup>	Davis, Polk & Wardwell	23 (1986)	\$960	2009	\$1,290	
Daniel Perry <sup>93</sup>	Milbank, Tweed	14 (2000)	\$1135	2014	\$1,316	
Delilah Vinzon <sup>93</sup>	Milbank, Tweed	12 (2002)	\$900	2014	\$1,043	
Hannah Cannom <sup>93</sup>	Milbank, Tweed	08 (2006)	\$760	2014	\$881	
Revi-Ruth Enriquez <sup>93</sup>	Milbank, Tweed	06 (2008)	\$800	2014	\$927	
Caitlin Hawks <sup>93</sup>	Milbank, Tweed	06 (2008)	\$760	2014	\$881	
Katherine Eklund <sup>93</sup>	Milbank, Tweed	05 (2009)	\$550	2014	\$638	
Amy Lalley <sup>94</sup>	Sidley Austin	14 (1998)	\$700	2012	\$861	
Amy Lalley <sup>94</sup>	Sidley Austin	16 (1998)	\$825	2014	\$956	
Alex Doherty <sup>94</sup>	Sidley Austin	04 (2008)	\$520	2012	\$640	
Alex Doherty <sup>94</sup>	Sidley Austin	06 (2008)	\$700	2014	\$811	
Lauren McCray <sup>94</sup>	Sidley Austin	01 (1998)	\$340	2012	\$418	

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports</b>					
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Lauren McCray <sup>94</sup>	Sidley Austin	02 (1998)	\$495	2014	\$574
Christopher Cox <sup>95</sup>	Weil Gotshal	23 (1991)	\$850	2014	\$985
Bambo Obaro <sup>95</sup>	Weil Gotshal	04 (2010)	\$400	2014	\$464
Jessica Mohr <sup>95</sup>	Weil Gotshal	01 (2013)	\$300	2014	\$348
Glenn Peterson <sup>96</sup>	Millstone Peterson & Watts	18 (1996)	\$600	2014	\$696
Diaana Torres <sup>97</sup>		26 (1992)	\$892	2018	\$919
Yungmoon Chang <sup>97</sup>		2 (2016)	\$554	2018	\$571
Keith Catuara <sup>97</sup>		Paralegal	\$334	2018	\$344
Andrew Bridges <sup>98</sup>	Fenwick & West	29 (1986)	\$930	2014	\$1,078
Ilana Rubel <sup>98</sup>	Fenwick & West	17 (1997)	\$750	2014	\$869
Jennifer Kelly <sup>98</sup>	Fenwick & West	17 (1997)	\$750	2014	\$869
Joseph Belichick <sup>98</sup>	Fenwick & West	11 (2003)	\$690	2014	\$800
Todd Gregorian <sup>98</sup>	Fenwick & West	10 (2005)	\$690	2014	\$800
Liwen Mah <sup>98</sup>	Fenwick & West	09 (2005)	\$690	2014	\$800
Jennifer J. Johnson <sup>98</sup>	Fenwick & West	07 (2007)	\$640	2014	\$742
Kathleen Lu <sup>98</sup>	Fenwick & West	05 (2009)	\$560	2014	\$649
Annasara Purcell <sup>98</sup>	Fenwick & West	03 (2011)	\$505	2014	\$585
Armen Nercessian <sup>98</sup>	Fenwick & West	02 (2012)	\$450	2014	\$522
Shannon K umagai <sup>98</sup>	Fenwick & West	01 (2014)	\$370	2014	\$429
Carol McCroy <sup>98</sup>	Fenwick & West	Paralegal	\$100	2014	\$116
Robert Winant <sup>98</sup>	Fenwick & West	Paralegal	\$295	2014	\$342
Sarah Victoria <sup>98</sup>	Fenwick & West	Paralegal	\$345	2014	\$400



**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	Firm	Practice Yrs [Grad Yr]	Rate	Year	Adjusted Rate
Lisa Magee <sup>98</sup>	Fenwick & West	Paralegal	\$240	2014	\$278
Brad Bonnington <sup>98</sup>	Fenwick & West	ESI Support Staff	\$275	2014	\$319
David Tran <sup>98</sup>	Fenwick & West	ESI Support Staff	\$290	2014	\$336

DRA stands for Disability Rights Advocates  
MTO stands for Munger, Tolles & Olson  
DRLC stands for Disability Rights Legal Center  
AFL stands for AARP Foundation Litigation  
KMBL stands for Kaye, McLane, Bednarski & Litt

**CIVIL RIGHTS LODESTAR AWARD SOURCES**

- <sup>1</sup> – *Vasquez v. Rackauckas*, SACV 09-1090 VBF, 2011 WL 1791091 (C.D. Cal. May 10, 2011) *aff'd in part, rev'd in part and remanded*, 734 F.3d 1025 (9<sup>th</sup> Cir. 2013) (lodestar award in civil rights injunctive relief class action regarding modification of state gang injunctions) (remand did not affect fee award)
- <sup>2</sup> – *Fitzgerald v. City of Los Angeles*, CV 03-01876DDP(RZX), 2009 WL 960825 (C.D. Cal. Apr. 7, 2009) (lodestar award in civil rights Skid Row litigation)
- <sup>3</sup> – *Charlebois v. Angels Baseball LP*, SACV 10-0853 DOC ANX, 2012 WL 2449849 (C.D. Cal. May 30, 2012) (lodestar award in settlement of ADA case)
- <sup>4</sup> – *Californians for Disability Rights v. California Dep't of Transp.*, C 06-05125 SBA MEJ, 2010 WL 8746910 (N.D. Cal. Dec. 13, 2010) *report and recommendation adopted sub nom. Californians for Disability Rights, Inc. v.*

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

*California Dep't of Transp.*, C 06-5125 SBA, 2011 WL 8180376 (N.D. Cal. Feb. 2, 2011) (Iodestar award in settlement of ADA case)

<sup>5</sup> – *Raunda v. City of Los Angeles*, CV08-3128-CAS PJW, 2010 WL 5375958 (C.D. Cal. Dec. 20, 2010) (Iodestar award in civil rights police misconduct case)

<sup>6</sup> – *Multi-Ethnic Immigrant Workers Org. Network v. City of Los Angeles*, CV 07-3072 AHM FMMX, 2009 WL 9100391 (C.D. Cal. June 24, 2009) (Iodestar cross-check in protest excessive force civil rights class action)

<sup>7</sup> – *Craft v. Cnty. Of San Bernardino*, 624 F. Supp. 2d 1113, 1122-23 (C.D. Cal. 2008) (Iodestar cross-check in jail civil rights class action)

<sup>8</sup> – *Pierce v. Cnty. Of Orange*, 905 F. Supp. 2d 1017, 1035-39, 1049 (C.D. Cal. 2012) (Iodestar award in jail ADA class action)

<sup>9</sup> – *L.H. v. Schwarzenegger*, 645 F. Supp. 2d 888, 893-96 (E.D. Cal. 2009) (Iodestar award in settlement of prison injunctive relief class action)

<sup>10</sup> – *Armstrong v. Brown*, 805 F. Supp. 2d 918, 920-21 (N.D. Cal. 2011) (Iodestar award in prison class action for monitoring work)

<sup>11</sup> – *A.D. v. State of California Highway Patrol*, C 07-5483 SI, 2013 WL 6199577 (N.D. Cal. Nov. 27, 2013) (civil rights Iodestar award for police killing) [Arnold & Porter and Quinn Emmanuel rates were described in opinion as support for awarded rates, and are contained in the commercial rates table with the attorney as ]“Unnamed”]

<sup>12</sup> – *Prison Legal News v. Schwarzenegger*, 608 F.3d 446, 455 (9<sup>th</sup> Cir. 2010), *upholding award in Prison Legal News v. Schwarzenegger*, 561 F. Supp. 2d 1095, 1106 (N.D. Cal. 2008) (post-settlement Iodestar award in prisoner First Amendment injunctive relief case)

<sup>13</sup> – *Communities Actively Living Independent and Free v. City of Los Angeles*, 2:090cv-00287 CBM-RZ-Doc # 255 (C.D. Cal. 6/10/13) (Iodestar award in settlement of ADA injunctive relief class action) [AVAILABLE AS EXHIBIT 13]

<sup>14</sup> – *Lauderdale v. City of Long Beach*, CV 08-979 ABC (JWJx) (C.D. Cal. 1/11/10) (Iodestar award after settlement of ADA injunctive relief class action against jail) [AVAILABLE AS EXHIBIT 14]

<sup>15</sup> – *Gamino v. County of Ventura*, CV 02-9785-CBM (Ex), Doc # 185 (C.D. Cal. 2/5/09) (Iodestar cross-check in jail civil rights class action) [AVAILABLE AS EXHIBIT 15]

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

- <sup>16</sup> – *P.C. v. City of Los Angeles*, 2:090cv-06495-PLA Doc # 77 (C.D. Cal. 9/4/12) (lodestar award in civil rights suit against police for excessive force resulting in death) [AVAILABLE AS EXHIBIT 16]
- <sup>17</sup> – *Avila v. LAPD*, No. CV 11-01326 sjo (FMOX) (C.D.Cal. 8/2/12) (lodestar award for retaliatory termination for testifying for FLSA plaintiff) [AVAILABLE AS EXHIBIT 17]
- <sup>18</sup> – *Vallabhapurapu v. Burger King Corp.*, Case No. C11-00667 WHA (JSC) (N.D.Cal. 10/26/2012) (lodestar award with multiplier of 1.29 in ADA accessibility class action; opinion refers to rates used to calculate the lodestar of up to \$825; Lee Dec dated 8/27/2012 sets forth the rates used to calculate the lodestar, including a rate of \$825 for him) [AVAILABLE AS EXHIBIT 18]
- <sup>19</sup> – *Rutti v. Lojack Corp., Inc.*, SACV 06-350 DOC JCX, 2012 WL 3151077 (C.D. Cal. July 31, 2012) (FLSA lodestar crosscheck)
- <sup>20</sup> – Fee award in *Comite De Jornaleros De Redondo Beach v. City of Redondo Beach*, CV 04-9396 CBMTTLX, 2006 WL 4081215 (C.D. Cal. Dec. 12, 2006) rev'd, 607 F.3d 1178 (9<sup>th</sup> Cir. 2010) on reh'g en banc, 657 F.3d 936 (9<sup>th</sup> Cir. 2011) and aff'd, 657 F.3d 936 (9<sup>th</sup> Cir. 2011) (civil rights case successfully challenging day laborer ordinance on First Amendment grounds)
- <sup>21</sup> – Fee award in *Long Beach Area Peace Network v. City of Long Beach*, No. CV 04-08510 JSO (SSx) (C.D.Calif.) (Doc # 64) (civil rights case successfully challenging parade ordinance on First Amendment grounds) (rates based on personal knowledge from fee declaration filed by Mr. Litt in the case) [AVAILABLE AS EXHIBIT 21]
- <sup>22</sup> – 2/22/10 Fee Order in *Riverside County Dept. of Mental Health v. A.S.*, No. CV 08-00511 ABC (C.D.Calif.) (IDEA fee award) (2009 used because it is clear from the timing of the order that 2009 rates were used)
- <sup>23</sup> – Fee order in *Dugan v. County of Los Angeles*, 2:11-cv-08145-CAS-SHX (C.D.Cal. 3/3/14) (4<sup>th</sup> Amendment, malicious prosecution § 1983 action; background as criminal defense lawyer; no evidence of prior experience litigating civil rights cases, but knowledge of 4<sup>th</sup> Amendment law and trial experience should be reflected in the rate) [AVAILABLE AS EXHIBIT 23]
- <sup>24</sup> – Fee order in *Heyen v. Safeway Inc.*, B243610, 2014 WL 2154676 (Cal. Ct. App. May 23, 2014) upheld (individual wage and hour case after denial of class certification, with damages award of approximately \$26,000; full hourly rate awarded to determine lodestar, then reduced due to limited success because received only 25% of overtime sought; fee award was in 2012, based on 2011 rates [since fee application was filed in 2011]).

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<sup>25</sup> – Lodestar fee award in *Echague v. Metro. Life Ins. Co.*, No. 12-CV-00640-WHO, 2014 WL 4746115, at \*2 (N.D. Cal. Sept. 24, 2014) – ERISA case.

<sup>26</sup> – Fee award in *Contreras v. City of Los Angeles*, 2:11-CV-1480-SVW-SH, 2013 WL 1296763 (C.D. Cal. Mar. 28, 2013) – individual police case

<sup>27</sup> – Fee order in *Dixon v. City of Oakland*, No. C-12-05207 DMR, 2014 WL 6951260, at \*8 (N.D. Cal. Dec. 8, 2014) – individual police case (1.1 multiplier awarded under Civil Code § 52.1).

<sup>28</sup> – Fee order in *Xue Lu v. United States*, No. CV 01-01758 CBM EX, 2014 WL 2468826, at \*5 (C.D. Cal. May 23, 2014) – EAJA market rate award (available due to government’s bad faith).

<sup>29</sup> – Fee order in *Xu v. Yamanaka*, No. 13-CV-3240 YGR, 2014 WL 3840105 (N.D. Cal. Aug. 1, 2014); award was for successful Anti-SLAPP motion; defendants voluntarily reduced rate sought by 10%

<sup>30</sup> – Fee order in *Aarons v. BMW of N. Am., LLC*, No. CV 11-7667 PSG CWX, 2014 WL 4090564 (C.D. Cal. Apr. 29, 2014) objections overruled, No. CV 11-7667 PSG CWX, 2014 WL 4090512 (C.D. Cal. June 20, 2014) –

consumer class action in which award was court determined lodestar, not percentage of fund.

<sup>31</sup> – Fee order in *Morey v. Louis Vuitton N. Am., Inc.*, No. 11CV1517 WQH BLM, 2014 WL 109194, at \*10 (S.D. Cal. Jan. 9, 2014) – consumer class action in which award was court determined lodestar, not percentage of fund; 1.51 multiplier..

<sup>32</sup> – Fee order in *Sanchez v. County of San Bernardino*, 10-09384 MMM (Opx) [3/1/14] – individual police case [AVAILABLE AS EXHIBIT 32]

<sup>33</sup> – Fee order in *Howard v. County of Riverside*, EDCV 12-00700 VAP (Opx) [8/27/14] – individual police case [AVAILABLE AS EXHIBIT 33].

<sup>34</sup> – Fee order in *Rodriguez v. Cty. of Los Angeles*, 96 F. Supp. 3d 1012 (C.D. Cal. 2014) [12/29/2014] – multi-plaintiff prisoners for guard brutality; award primarily under California state law for Civil Code 52.1 claim, with part of award on exclusively federal claims under PLRA; multiplier of two for state fee award.

<sup>35</sup> – Fee Order in *Willits v. City of Los Angeles*, CV 10-5782 CBM (RZx) (8/25/16) – class action injunctive relief case under ADA, RA [AVAILABLE AS EXHIBIT 35].

<sup>36</sup> – *Woods v. Fagan*, CV 14-8374-VAP (SPx) (C.D. Cal.) (9/21/16 Fee Order) [AVAILABLE AS EXHIBIT 36].

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<sup>37</sup> – *Garcia v. Los Angeles County Sheriff's Dept.*, No. CV 09-8943-DMG (SHx), 7/28/17 Order approving settlement and fees, Anna Rivera Dec. in support (dated 6/8/17) - special education in LA County Jail, (rates listed in Doc. 452 [AVAILABLE AS EXHIBIT 37].

<sup>38</sup> – *Nozzi v. HACLA*, Case No. 2:07 cv 00380 PA (FFMx) (C.D. Cal.) (1/5/18 Final Approval Order), 2018 WL 1659984, Litt and Richardson Fee Declarations in support of motion for fees (12/22/17 Declarations of Barret S. Litt and Anne Richardson in support of Plaintiffs' Motion for Final Approval of Settlement in *Nozzi v. Housing Authority of the 38 39– City of Los Angeles*, CV 07-380-PA-FFM (Dkt. #s 323 and 324); 2/15/18 Order re: Motion for Final Approval (Dkt. # 331) (Because the fee motion was filed in 2017, using 2017 rates, the year listed is 2017 although the order was in early 2018.

<sup>39</sup> – *Garcia v. Los Angeles County Sheriff's Dept.*, No. CV 09-8943-DMG (SHx), 7/28/17 Order approving settlement and fees, Anna Rivera Dec. in support (dated 6/8/17) - special education in LA County Jail [AVAILABLE AS EXHIBIT 39].

<sup>40</sup> – *McKibben v. San Bernardino County Sheriff's Dept.*, No. CV 5:14-02171-JGB (Spx), 2019 WL 1109683 (C.D. Cal. Feb. 28, 2019) 02/28/19 Order approving settlement and fees, and referring to listed rates as "the hourly rates of Plaintiffs' attorneys fall within the reasonable range for attorneys of their experience in this district" (although requested award was discounted in order to obtain a model of injunctive relief; Barrett Litt declaration in support - class action for discrimination against Gay, Bisexual and Transgender inmates in housing, program and work opportunities in San Bernardino County Jail [because application used 2018 rates, although order was entered in early 2019, 2018 rates were used])

OF THE 40 CIVIL RIGHTS CASES, 30 ARE FROM THE CENTRAL DISTRICT, 8 FROM THE NORTHERN DISTRICT, 1 FROM THE EASTERN DISTRICT, 1 FROM THE SOUTHERN DISTRICT AND 1 FROM LOS ANGELES COUNTY SUPERIOR COURT. AT LEAST THE CENTRAL AND NORTHERN DISTRICT RATES ARE COMPARABLE, AND MANY FIRMS PRACTICE IN BOTH. (FOR THIS PURPOSE, ERISA AND ANTI-SLAPP ARE INCLUDED)

**CLASS ACTION LODESTAR CROSS CHECK SOURCES**



**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

- <sup>51</sup> – *Wren v. RGIS Inventory Specialists*, C-06-05778 JCS, 2011 WL 1230826 (N.D. Cal. Apr. 1, 2011) *supplemented*, C-06-05778 JCS, 2011 WL 1838562 (N.D. Cal. May 13, 2011)
- <sup>52</sup> – *Bolton v. U.S. Nursing Corp.*, C 12-4466 LB, 2013 WL 5700403 (N.D. Cal. Oct. 18, 2013)
- <sup>53</sup> – *Johansson-Dohrmann v. Chr Sys, Inc.*, 12-CV-1115-MMA BGS, 2013 WL 3864341 (S.D. Cal. July 24, 2013)
- <sup>54</sup> – *Thieriot v. Celtic Ins. Co.*, C-10-04462-LB, 2011 WL 1522385 (N.D. Cal. Apr. 21, 2011)
- <sup>55</sup> – *Browne v. Am. Honda Motor Co., Inc.*, CV 09-06750 MMM DTBX, 2010 WL 9499073 (C.D. Cal. Oct. 5, 2010)
- <sup>56</sup> – *Parkinson v. Hyundai Motor Am.*, 796 F. Supp. 2d 1160, 1164-66, 1170-73 (C.D. Cal. 2010)
- <sup>57</sup> – *Pelletz v. Weyerhaeuser Co.*, 592 F. Supp. 2d 1322, 1326-27 (W.D. Wash. 2009)
- <sup>58</sup> – *Gonzalez v. S. Wine & Spirits of Am. Inc.*, No. 2:11-CV-05849-ODW, 2014 WL 1630674, at \*2 (C.D. Cal. Apr. 24, 2014))
- <sup>58</sup> – *G. F. v. Contra Costa Cty.*, 2015 WL 7571789, at \*13 (N.D. Cal. Nov. 25, 2015)
- <sup>59</sup> – *Stone v Howard Johnson*, Case No. 12-CV-01684 PSG (MANx) (C.D. Cal.), Fee Declaration of Matthew A. Young in support of Class Fee Application, **AVAILABLE AS EXHIBIT 59**
- <sup>60</sup> – *In re High-Tech Employee Antitrust Litig.*, No. 11-CV-02509-LHK, 2015 WL 5158730, at \*8–190, 10-11 [\$415 Million settlement in employment antitrust class action, declining to use % fund and employing lodestar with multiplier of 2.5 when considering all fees

**COMMERCIAL LITIGATION SOURCES**

<sup>81</sup> – *Apple, Inc. v. Samsung Electronics Co., Ltd.*, C 11-1846 LHK PSG, 2012 WL 5451411 (N.D. Cal. Nov. 7, 2012)). The rates listed reflect what Quinn Emmanuel indicated were its standard rates for the attorneys being billed; the court award was lower as follows: Marc Becker - \$800; Diane Hutnyan - \$700; Victoria Maroulis - \$700; Todd Briggs - \$700; Melissa Dalziel - \$681. Because Mr. Becker is based in London he was marked for whether he was designated as a SuperLawyer.

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<sup>82</sup> – Skadden Arps bill Bill to MGA Entertainment Inc. in *Mattel v. MGA Entertainment*, Case No. 04 CV 09049-DOC (C.D.Cal.), filed 7/11/1, Doc 10684-50; rates accepted without objection and ordered in Doc. 10703 (8/4/11) [AVAILABLE AS EXHIBIT 82]

<sup>83</sup> – Declaration of Arturo Gonzalez in *Bullis Charter School v. Los Altos School District et al.*, Case No. 109 CV144569 (Santa Clara Sup. Ct., filed 10/19/13). Although *Bullis* is arguably a public interest case, we are presenting this as a reflection of Mr. Gonzalez's and Ms. Brickman's normal rates, which is what Mr. Gonzalez explains in his declaration. [AVAILABLE AS EXHIBIT 83]

<sup>84</sup> – The Lieff Cabraser rates were provided in a 3/21/2012 email from firm partner as their standard rates for 2012; Lieff Cabraser is a contingent fee firm specializing in class actions.

<sup>85</sup> – Email from ACLU to Barry Litt of 7/26/11 with Paul Hastings rate information provided to ACLU by former Paul Hastings associate.

<sup>86</sup> – 4/9/09 Gibson Dunn partner Wayne Barsky Declaration in *Rogel v. Development Agency of City of Lynwood*, Case No. BS106592 (reflecting Gibson Dunn standard rates) [AVAILABLE AS EXHIBIT 86]

<sup>87</sup> – 11/27/08 Dec. of Quinn Emmanuel partner Danielle Gilmore in *Monrovia Nursing Co. v. Rosedale*, Case No. BC 351140 (LA Sup. Ct.) (reflecting Gibson Dunn standard rates) [AVAILABLE AS EXHIBIT 87]

<sup>88</sup> – 10/16/09 Fee Order for Greenberg Taurig attorneys in *Santa Fe Pointe, L.P. v. Greystone Servicing Corp.*, C-07-5454 MMC, 2009 WL 3353449 (N.D. Cal. 10/16/09) (reflecting rates billed to client)

<sup>89</sup> – 11/21/08 Dec. of O'Irell & Manella partner Brian Hennigan in *Monrovia Nursery Co. v. Rosedale*, No. BC351140 (Los Angeles Superior Court) (reflecting customary rates, which were billed to client in the case) (rates rounded down to the closest \$5) [AVAILABLE AS EXHIBIT 89]

<sup>90</sup> – 1/09/09 Bankruptcy Fee Application in *In re Three A's Holdings, L.L.C.*, No CV-04-07131- SVW (D. Del.) [bankruptcy fee application; only adversarial (litigation) rates relied on]

<sup>91</sup> – 11/17/10 Declaration of James Gillian in support of fee application in *La Asociacion De Trabajadores De Lake Forest v. City of Lake Forest*, CA 9 Case #09-55215 (Dkt. # 43-7) [AVAILABLE AS EXHIBIT 91]

<sup>92</sup> – Selected rates compiled from 2009 Westlaw Court Express

<sup>93</sup> – Milbank Tweed rates being sought for DRLC co-counsel in *LAUSD v. Michael Garcia*, Case No. 10-55879 (9<sup>th</sup> Cir.); listed in email from DRLC counsel Anna Rivera on 2/24/14 [not yet in other tables as of 2/24]

<sup>94</sup> – Sidley Austin rates listed in Declaration of Amy Lalley for fee motion in *Jones v. Upland Housing Authority*,

**RATE TABLES; TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

NO.: EDCV 12-2074 VAP (Opx) (Dkt. # 46 2/24/14) [AVAILABLE AS EXHIBIT 94]

<sup>95</sup> – Fee award in anti-SLAPP motion in *Xu v. Yamanka*, 2014 WL 3840105 (N.D. Cal. Aug. 1, 2014)

<sup>96</sup> – *Altavion, Inc. v. Konica Minolta Sys. Lab. Inc.*, 226 Cal. App. 4th 26, 71, 171 Cal. Rptr. 3d 714, 750 (2014), review denied (Aug. 20, 2014) [Trade secrets litigation; lodestar award]

<sup>97</sup> – *AECOM Energy & Constr., Inc. v. Ripley*, No. CV175398RSLSSX, 2018 WL 4904774, at \*3 - award of fees for obtaining contempt order in trademark dispute

<sup>98</sup> – *Perfect 10, Inc. v. Giganews, Inc.*, No. CV 11-07098-AB SHX, 2015 WL 1746484, at \*15–21 (C.D. Cal. Mar. 24, 2015), aff'd, 847 F.3d 657 (9th Cir. 2017) [award in 2015 but using 2014 rates] [copyright case] [expert report noted that partner rates in the Los Angeles Area can exceed \$1,400 per hour on the “super-premium” end that Tenwick & West rates were “materially lower ... than those of other attorneys of similar experience and expertise practicing at other preeminent law firms in the Los Angeles market.” Case had 700 docket entries and was precisely the sort of complex, large, and burdensome case that justified top-tier litigators.]

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

**II. RATES FROM SECTION I ORGANIZED BY YEARS OF PRACTICE**

**A. Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks**

<b>Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks</b>						
<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>	
Sid Wolinsky <sup>13</sup>	DRA *	51 (1961)	\$860	2012	\$1,058	
Barrett S. Litt <sup>38</sup>	KMBL	49 (1969)	\$1,150	2017	\$1,220	
Barrett S. Litt <sup>40</sup>	KMBL	49 (1969)	\$1,150	2018	\$1,185	
Sid Wolinsky <sup>4</sup>	DRA *	49 (1961)	\$835	2010	\$1,089	
Unnamed <sup>10</sup>	Rosen Bien & Galvan	48 (1962)	\$800	2010	\$1,044	
Sanford J. Rosen <sup>12</sup>	Rosen Bien & Galvan	46 (1962)	\$700	2008	\$969	
Barrett S. Litt <sup>34</sup>	KMBL	45 (19690)	\$975	2014	\$1,130	
Richard Pearl <sup>27</sup>		44 (1970)	\$750	2014	\$869	
Ian Herzog <sup>24</sup>	Law Office of Ian Herzog	44 (1967)	\$1,000	2011	\$1,267	
Barrett S. Litt <sup>8</sup>	Litt, Estuar & Kitson	43 (1969)	\$850	2012	\$1,045	
Amitai Schwartz <sup>11</sup>	Law Offices of Amitai Schwartz	40 (1973)	\$725	2013	\$866	
Barrett S. Litt <sup>6</sup>	Litt, Estuar & Kitson	40 (1969)	\$800	2009	\$1,075	
Paul R. Fine <sup>24</sup>	Daniels, Fine, Israel, Schonbuch & Lebovits	39 (1972)	\$850	2011	\$1,077	
Barrett S. Litt <sup>15</sup>	Litt, Estuar & Kitson	39 (1969)	\$750	2008	\$1,038	
Dan Stormer <sup>8</sup>	HSKRR****	38 (1974)	\$825	2012	\$1,015	

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks</b>					
<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Bill Lann Lee <sup>18</sup>	Lewis, Feinberg, Lee, Renaker, & Jackson	38 (1974)	\$825	2012	\$1,015
Barrett S. Litt <sup>7</sup>	Litt, Estuar & Kitson	38 (1969)	\$725	2007	\$1,034
John Houston Scott <sup>11</sup>	Scott Law Firm	37 (1976)	\$725	2013	\$866
Stephen Glick <sup>24</sup>	Law Offices of Stephen Glick	37 (1974)	\$800	2011	\$1,013
Paula Pearlman <sup>37</sup>	DRLC	35 (1982)	\$875	2017	\$928
Paula Pearlman <sup>39</sup>	DRLC	35 (1982)	\$875	2017	\$928
David Borgen <sup>35</sup>	Goldstein Borgen Dardarian	35 (1981)	\$795	2016	\$869
Mark Rosenbaum <sup>2</sup>	ACLU	35 (1974)	\$740	2009	\$994
Thomas P. Greerty <sup>11</sup>	Law Offices of Thomas P. Greerty	34 (1979)	\$725	2013	\$866
Paul L. Hoffman <sup>6</sup>	Schonbrun, de Simone	33 (1976)	\$750	2009	\$1,008
David M. McLane <sup>40</sup>	KMBL	32 (1986)	\$875	2018	\$901
Carol Sobel <sup>21</sup>	Law Office of Carol Sobel	32 (1978)	\$725	2010	\$946
Unnamed <sup>10</sup>	Prison Law Office	32 (1978)	\$700	2010	\$913
Unnamed <sup>10</sup>	Bingham, McCutcheon	32 (1978)	\$700	2010	\$913
Jose R. Allen <sup>35</sup>	Skadden, Arps	31 (1985)	\$1150	2016	\$1,257
Carol Sobel <sup>2</sup>	Law Ofc Carol Sobel	31 (1978)	\$710	2009	\$954
Carol A. Sobel <sup>6</sup>	Law Offices of Carol Sobel	31 (1978)	\$710	2009	\$954
Lisa Jaskol <sup>38</sup>	Public Counsel	30 (1988)	\$850	2017	\$902
Ronald O. Kaye <sup>40</sup>	KMBL	30 (1988)	\$875	2018	\$901
Anne Richardson <sup>38</sup>	Public Counsel	29 (1989)	\$850	2017	\$902



**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks</b>						
<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>	
Linda Dardarian <sup>35</sup>	Goldstein Borgen Dardarian	29 (1987)	\$775	2016	\$847	
Michael Bien <sup>9</sup>	Rosen Bien Galvan & Grunfeld	28 (2008)	\$640	2008	\$886	
David M. McLane <sup>34</sup>	KMBL	28 (1988)	\$775	2014	\$898	
Jim DeSimone <sup>28</sup>	Schonbrun, de Simone	28 (1985)	\$725	2013	\$866	
Susan Abitanta <sup>24</sup>	Law Office of Ian Herzog	28 (1983)	\$600	2011	\$760	
Robert Rubin <sup>20</sup>	LCCR	28 (1978)	\$625	2006	\$918	
Larry Paradis <sup>13</sup>	DRA *	27 (1985)	\$800	2012	\$984	
Matthew Righetti <sup>19</sup>	Righetti Glugoski	27 (1985)	\$750	2012	\$922	
James de Simone <sup>3</sup>	Schonbrun, de Simon	27 (1985)	\$695	2012	\$855	
Pat Dunlevy <sup>38</sup>	KMBL	26 (1992)	\$750	2017	\$796	
Patrick Dunlevy <sup>38</sup>	Public Counsel	26 (1992)	\$750	2017	\$796	
Humberto Guizar <sup>16</sup>		26 (1986)	\$500	2012	\$615	
Laurence Paradis <sup>4</sup>	DRA *	26 (1985)	\$730	2010	\$952	
Daniel B. Kohrman <sup>4</sup>	AFL*****	26 (1984)	\$740	2010	\$966	
Paul Estuar <sup>38</sup>	KMBL	25 (1993)	\$765	2017	\$812	
Dale Galipo <sup>32</sup>	Law Ofc Dale Galipo	25 (1989)	\$800	2014	\$927	
Dale Galipo <sup>33</sup>	Law Ofc Dale Galipo	25 (1989)	\$800	2014	\$927	
Ronald O. Kaye <sup>34</sup>	KMBL	25 (1989)	\$775	2014	\$898	
Ron Elsberry <sup>13</sup>	DRA *	25 (1987)	\$725	2012	\$892	
Jose R. Allen <sup>4</sup>	Skadden Arps	25 (1985)	\$930	2010	\$1,213	
Ben Schonbrun <sup>5</sup>	Schonbrun, de Simone	25 (1985)	\$650	2010	\$848	
Hernan Vera <sup>38</sup>	Public Counsel	24 (1994)	\$750	2017	\$796	

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 1: Civil Rights Lodestar Awards/Crosschecks</b>					
<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Timothy G. Blood <sup>30</sup>	Blood Hurst and O'Reardon	24 (1990)	\$695	2014	\$806
Dale Galipo <sup>26</sup>	Law Ofc Dale Galipo	24 (1989)	\$675	2013	\$806
Michael Haddad <sup>27</sup>	Haddad & Sherwin	23 91991)	\$725	2014	\$840
Guy Wallace <sup>35</sup>	Schneider Wallace	23 (1993)	\$750	2016	\$820
Christopher Cox <sup>29</sup>	Weill Gotschall	23 (1991)	\$850	2014	\$985
Michael Seplow <sup>28</sup>	Schonbrun, de Simone	23 (1990)	\$660	2013	\$788
Dale Galipo <sup>16</sup>	Law Ofc of Dale Galipo	23 (1989)	\$700	2012	\$861
Michael Seplow <sup>3</sup>	Schonbrun, de Simon	22 (1990)	\$630	2012	\$775
Douglas D. Winter <sup>17</sup>	McNicholas & McNicholas	22 (1990)	\$600	2012	\$738
Brian Dunn <sup>36</sup>	Cochran Firm	21 (1995)	\$750	2016	\$820
Michelle Uzeta <sup>13</sup>	DRLC***	20 (1992)	\$700	2012	\$861
Michael Seplow <sup>5</sup>	Schonbrun, de Simone	20 (1990)	\$590	2010	\$770
Anne Richardson <sup>2</sup>	HSKRR****	20 (1989)	\$575	2009	\$773
Earnest Bell <sup>15</sup>	Law Offices of Earnest Bell	20 (1988)	\$600	2008	\$831
Julia Sherwin <sup>27</sup>	Haddad & Sherwin	19 (1995)	\$695	2014	\$806
Scott A. Brooks <sup>24</sup>	Daniels, Fine, Israel, Schonbuch & Lebovits	19 (1992)	\$650	2011	\$823
Julie Nepveu <sup>4</sup>	AFL*****	19 (1991)	\$660	2010	\$861
Shawna Parks <sup>37</sup>	DRLC	18 (1999)	\$745	2017	\$790
Ronald K. Tellis <sup>30</sup>	Baron & Budd	18 (1996)	\$775	2014	\$898
Todd Burns <sup>23</sup>	Law Office of Todd Burns	18 (1996)	\$650	2014	\$754
Bryan M. Miller <sup>8</sup>	Litt, Estuar & Kitson	18 (1994)	\$625	2012	\$769
Craig Momita <sup>24</sup>	Daniels, Fine, Israel, Schonbuch & Lebovits	18 (1993)	\$400	2011	\$507

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks</b>					
<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Melissa Kasnitz <sup>4</sup>	DRA *	18 (1992)	\$650	2010	\$848
Shawna Parks <sup>35</sup>	Law Ofc Shawna Parks	17 (1999)	\$695	2016	\$759
Robert M. Kitson <sup>8</sup>	Litt, Estuar & Kitson	17 (1995)	\$625	2012	\$769
Hector O. Villagra <sup>1</sup>	ACLU	17 (1994)	\$600	2011	\$760
John Raphling <sup>5</sup>	Schonbrun, de Simone	17 (1993)	\$525	2010	\$685
Robert Dell Angelo <sup>14</sup>	MTO**	17 (1992)	\$550	2009	\$739
Rebecca Grey <sup>25</sup>		16 (1998)	\$650	2014	\$754
Melissa Goodman <sup>40</sup>	ACLU	15 (2003)	\$715	2018	\$736
Douglas Ingraham <sup>28</sup>	Schonbrun, de Simone	15 (1998)	\$575	2013	\$687
Matthew McNicholas <sup>17</sup>	McNicholas & McNicholas	15 (1997)	\$700	2012	\$861
Peter Eliasberg <sup>2</sup>	ACLU	15 (1994)	\$525	2009	\$706
Angela Padilla <sup>20</sup>	MoFo	15 (1991)	\$600	2006	\$881
Stephanie Carroll <sup>38</sup>	Public Counsel	14 (2004)	\$640	2017	\$679
Maronel Barajas <sup>37</sup>	DRLC	14 (2003)	\$675	2017	\$716
Gene J. Stonebarger <sup>31</sup>	Stonebarger Law, APC	14 (2000)	\$650	2014	\$754
Paul Estuar <sup>7</sup>	Litt, Estuar & Kitson	14 (1993)	\$485	2007	\$691
Amanda Goad <sup>40</sup>	ACLU	13 (2005)	\$640	2018	\$659
Matthew Stugar <sup>37</sup>	DRLC	13 (2004)	\$660	2017	\$700
Shawna Parks <sup>13</sup>	DRA *	13 (1999)	\$665	2012	\$818
Unnamed <sup>10</sup>	Bingham, McCutcheon	13 (1997)	\$655	2010	\$855
Unnamed <sup>10</sup>	Rosen Bien & Galvan	13 (1997)	\$560	2010	\$731
Umbreen Bhatti <sup>37</sup>	DRLC	12 (2005)	\$640	2017	\$679
John Glugoski <sup>19</sup>	Righetti Glugoski	12 (1997)	\$650	2012	\$799

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks</b>					
<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Carly Munson <sup>37</sup>	DRLC	11 (2006)	\$625	2017	\$663
Catherine Schmidt <sup>17</sup>	McNicholas & McNicholas	11 (2001)	\$500	2012	\$615
Belinda Escobosa Helzer <sup>1</sup>	ACLU	11 (2000)	\$525	2011	\$665
Paul Hughes <sup>38</sup>	Mayer, Brown	10 (2008)	\$730	2017	\$774
Lindsay Battles <sup>40</sup>	KMBL	10 (2008)	\$600	2018	\$618
Andrea Oxman <sup>37</sup>	DRLC	10 (2007)	\$600	2017	\$637
Kevin LaHue <sup>34</sup>	KMBL	10 (2004)	\$600	2014	\$696
Katherine Weed <sup>13</sup>	DRA *	10 (2002)	\$600	2012	\$738
Joseph J. Ybarra <sup>1</sup>	MTO**	10 (2001)	\$550	2011	\$697
Jennifer Bezoza <sup>4</sup>	DRA *	10 (2000)	\$570	2010	\$744
Shawna Parks <sup>14</sup>	DRLC	10 (1999)	\$525	2009	\$706
Moiria Duvernay <sup>11</sup>	Law Offices of Amitai Schwartz	09 (2004)	\$450	2013	\$537
Jennifer Lee <sup>13</sup>	DRLC***	09 (2003)	\$550	2012	\$676
Peter Bibring <sup>1</sup>	ACLU	09 (2002)	\$490	2011	\$621
Roger Heller <sup>4</sup>	DRA *	09 (2001)	\$560	2010	\$731
Rebecca Thornton <sup>21</sup>	Law Office of Carol Sobel	09 (2001)	\$450	2010	\$587
Adelaide Anderson <sup>38</sup>	Public Counsel	08 (2010)	\$540	2017	\$573
Elliot Field <sup>37</sup>	DRLC	08 (2009)	\$525	2017	\$557
Matthew Strugar <sup>13</sup>	DRLC***	08 (2004)	\$525	2012	\$646
Jacob A. Kreilkamp <sup>1</sup>	MTO**	08 (2003)	\$505	2011	\$640
Sage Reeves <sup>14</sup>	DRLC	08 (2001)	\$475	2009	\$638
Rebecca Thornton <sup>6</sup>	Law Offices of Carol Sobel	08 (2001)	\$425	2009	\$571

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks</b>					
<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Richard D. Lambert <sup>31</sup>	Stonebarger Law	07 (2007)	\$500	2014	\$580
Mary-Lee Smith <sup>13</sup>	DRA *	07 (2005)	\$555	2012	\$683
Kevin Knestrick <sup>4</sup>	DRA *	07 (2003)	\$535	2010	\$698
Peter Bibring <sup>2</sup>	ACLU	07 (2002)	\$375	2009	\$504
Brendan Hamme <sup>40</sup>	ACLU	06 (2012)	\$480	2018	\$494
Caitlin Weisberg <sup>34</sup>	KMBL	06 (2008)	\$500	2014	\$580
Anna Canning <sup>3</sup>	Schonbrun, de Simon	06 (2006)	\$450	2012	\$553
Kasey Corbit <sup>4</sup>	DRA *	06 (2004)	\$500	2010	\$652
Sanjuka Paul <sup>2</sup>	HSKRR ****	06 (2003)	\$350	2009	\$470
Genevieve Guertin <sup>27</sup>	Haddad & Sherwin	05 (2009)	\$400	2014	\$464
Debra Patkin <sup>13</sup>	DRLC***	05 (2007)	\$450	2012	\$553
Karla Gilbride <sup>13</sup>	DRA *	05 (2007)	\$430	2012	\$529
Stephanie Biedermann <sup>13</sup>	DRA *	05 (2007)	\$430	2012	\$529
Christine Chuang <sup>13</sup>	DRA *	05 (2007)	\$430	2012	\$529
Laura D. Smolowe <sup>1</sup>	MTO**	05 (2006)	\$460	2011	\$583
Mary-Lee Kimber <sup>4</sup>	DRA *	05 (2005)	\$475	2010	\$620
Sheryl Wu Leung <sup>4</sup>	Skadden Arps	05 (2005)	\$395	2010	\$515
Matthew Strugar <sup>14</sup>	DRLC	05 (2004)	\$400	2009	\$538
Tasha Hill <sup>40</sup>	ACLU	04 (2014)	\$390	2018	\$402
Aditi Fruitwala <sup>40</sup>	ACLU	04 (2014)	\$390	2018	\$402
Bambo Obarro <sup>29</sup>	Weill Gotschall	04 (2010)	\$400	2014	\$464
Gina Altomare <sup>27</sup>	Haddad & Sherwin	04 (2010)	\$350	2014	\$406
Heather McGunigle <sup>22</sup>	DRLC	04 (2009)	\$375	2009	\$504



**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks</b>					
<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Bethany Woodard <sup>14</sup>	MTO**	04 (2005)	\$395	2009	\$531
Marina A. Torres <sup>1</sup>	MTO**	03 (2008)	\$385	2011	\$488
Sarala V. Nagala <sup>1</sup>	MTO**	03 (2008)	\$385	2011	\$488
Stephanie Biedermann <sup>4</sup>	DRA*	03 (2007)	\$350	2010	\$457
Kristina Wilson <sup>14</sup>	MTO**	03 (2006)	\$350	2009	\$470
Thomas Kennedy Helm <sup>27</sup>	Haddad & Sherwin	02 (2012)	\$325	2014	\$377
Kara Janssen <sup>13</sup>	DRA*	02 (2010)	\$330	2012	\$406
Nathaniel Fisher <sup>4</sup>	Skadden Arps	02 (2008)	\$530	2010	\$692
Unnamed <sup>10</sup>	Bingham, McCutcheon	02 (2008)	\$400	2010	\$522
Becca von Behren <sup>4</sup>	DRA*	02 (2008)	\$265	2010	\$346
Mahogany Jenkins <sup>20</sup>	MoFo	02 (2004)	\$285	2006	\$419
Unnamed <sup>10</sup>	Prison Law Office	01 (2009)	\$275	2010	\$359
Stacey Brown <sup>7</sup>	Litt, Estuar & Kitson	01 (2006)	\$275	2007	\$392
Technology manager <sup>4</sup>	Skadden Arps		\$320	2010	\$418
Legal assistant <sup>4</sup>	Skadden Arps		\$285	2010	\$372
Julia White <sup>38</sup> [Sr. Paralegal]	KMBL		\$335	2017	\$355
Senior paralegals <sup>4</sup>	DRA*		\$265	2010	\$346
Julia White <sup>40</sup> [Sr. Paralegal]	KMBL		\$335	2018	\$345
Julia White <sup>34</sup> [Sr. Paralegal]	KMBL		\$295	2014	\$342

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks</b>					
<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Sr. Paralegal <sup>15</sup>	Litt, Estuar & Kitson		\$235	2008	\$325
Senior Paralegals <sup>7</sup>	Litt, Estuar & Kitson		\$225	2007	\$321
Summer associates <sup>4</sup>	DRA *		\$245	2010	\$320
AL_S <sup>1</sup>	MTO**		\$250	2011	\$317
Sr. paralegal <sup>10</sup>	Rosen Bien & Galvan		\$240	2010	\$313
Sr. paralegal <sup>8</sup>	Litt, Estuar & Kitson		\$250	2012	\$307
Paralegal	DRA *		\$240	2012	\$307
Law Clerks <sup>14</sup>	MTO**		\$220	2009	\$296
Summer Associates <sup>13</sup>	DRA *		\$250	2012	\$295
Paralegals <sup>4</sup>	DRA *		\$225	2010	\$294
Law Clerk <sup>13</sup>	DRLC***		\$230	2012	\$283
Litigation Assist <sup>13</sup>	DRLC***		\$230	2012	\$283
Law student interns <sup>8</sup>	Litt, Estuar & Kitson		\$225	2012	\$277
Heath White <sup>34</sup> [High Tech Paralegal]	KMBL		\$235	2014	\$272
Paralegal <sup>1</sup>	MTO**		\$210	2011	\$266
Law Clerks <sup>37</sup>	DRLC		\$250	2017	\$265
Paralegal <sup>20</sup>	MoFo		\$175	2006	\$257
Paralegal <sup>1</sup>	ACLU		\$200	2011	\$253
Law student interns <sup>3</sup>	Schonbrun, de Simon		\$200	2012	\$246
Sujata Awasthi <sup>40</sup> [Law Clerk]	ACLU		\$225	2018	\$232
Evan Etinghoff <sup>40</sup> [Law Clerk]	KMBL		\$225	2018	\$232

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks</b>					
<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Paralegals (not senior) <sup>27</sup>	Haddad & Sherwin		\$200	2014	\$232
Law clerks <sup>4</sup>	DRA *		\$175	2010	\$228
Case clerks <sup>4</sup>	DRA *		\$165	2010	\$215
Jackie Chidiac <sup>38</sup> [Paralegal]	Public Counsel		\$200	2017	\$212
Maria Cabadas <sup>38</sup> [Litigation Coordinator]	Public Counsel		\$190	2017	\$202
Diana Gonzalez <sup>40</sup> [Paralegal]	ACLU		\$195	2018	\$201
Rene Arriaza <sup>40</sup> [Paralegal]	KMBL		\$175	2018	\$180

**B. Table 2: Consumer/Wage & Hour Class Action Lodestar Crosschecks**

<b>Table 2: Consumer/Wage &amp; Hour Class Action Lodestar Crosschecks</b>					
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Richard Heimann <sup>60</sup>	Leiff Cabraser Heimann & Bernstein	40 (1975)	\$900	2015	\$1,013

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

**Table 2: Consumer/Wage & Hour Class Action Lodestar Crosschecks**

Atty	Firm	Practice Yrs [Grad Yr]	Rate	Year	Adjusted Rate
Daniel Girard <sup>60</sup>	Girard Gibbs	31 (1984)	\$845	2015	\$951
Jonathan E. Gertler <sup>52</sup>	Chavez & Gertler	31 (1983)	\$725	2013	\$866
Paul Kiesel <sup>59</sup>	Kiesel Law LLP	30 [1985]	\$1,100	2015	\$1,238
Todd Schneider <sup>54</sup>	Schneider Wallace	29 (1982)	\$675	2011	\$855
Eric L. Cramer <sup>60</sup>	Berger Montague	22 (1990)	\$900	2015	\$1,013
Kelly Dermody <sup>60</sup>	Leiff Cabraser Heimann & Bernstein	21 (1994)	\$800	2015	\$900
Patrick N. Keegan <sup>53</sup>	Keegan & Baker LLP	20 (1993)	\$695	2013	\$830
Shawn Khorrami <sup>58</sup>	Khorrami Boucher Sumner Sanguinetti, LLP	19 (1995)	\$650	2014	\$754
Jeffrey A. Koncius <sup>59</sup>	Kiesel Law LLP	18 [1997]	\$625	2015	\$703
Amanda Steiner <sup>60</sup>	Girard Gibbs	18 (1997)	\$650	2015	\$732
Guy Wallace <sup>51</sup>	Schneider Wallace	17 (1993)	\$650	2010	\$848
Jonathan Selbin <sup>57</sup>	Lieff Cabraser	16 [1993]	\$600	2009	\$806
Eric Gibbs <sup>55</sup>	Girard Gibbs	15 (1995)	\$675	2010	\$881
Eric Gibbs <sup>56</sup>	Girard Gibbs	15 (1995)	\$675	2010	\$881
Josh Konecky <sup>51</sup>	Schneider Wallace	14 (1996)	\$625	2010	\$815
Dan L. Gildor <sup>52</sup>	Chavez & Gertler	12 (2002)	\$550	2013	\$657
Launa Adolph <sup>58</sup>	Khorrami Boucher Sumner Sanguinetti, LLP	11 (2003)	\$495	2014	\$574
Dylan Hughes <sup>55</sup>	Girard Gibbs	10 (2000)	\$545	2010	\$711
Matthew A. Young <sup>59</sup>	Kiesel Law LLP	06 [2009]	\$375	2015	\$422

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

**C. Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports**

<b>Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports</b>					
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Sarah Victoria <sup>98</sup>	Fenwick & West	Paralegal	\$345	2014	\$400
Keith Catuara <sup>97</sup>		Paralegal	\$334	2018	\$344
Robert Winant <sup>98</sup>	Fenwick & West	Paralegal	\$295	2014	\$342
Lisa Magee <sup>98</sup>	Fenwick & West	Paralegal	\$240	2014	\$278
Carol McCroy <sup>98</sup>	Fenwick & West	Paralegal	\$100	2014	\$116
David Tran <sup>98</sup>	Fenwick & West	ESI Support Staff	\$290	2014	\$336
Brad Bonnington <sup>98</sup>	Fenwick & West	ESI Support Staff	\$275	2014	\$319
Unnamed <sup>84</sup>	Lieff Cabraser	42 (1970)	\$900	2012	\$1,107
Thomas J. Nolan <sup>82</sup>	Skadden Arps	40 (1971)	\$1095	2011	\$1,387
Unnamed <sup>11</sup>	Arnold & Porter	39 (1974)	\$910	2013	\$1,087
Unnamed <sup>92</sup>	Munger, Tolles & Olson	39 (1970)	\$625	2009	\$840
Unnamed <sup>84</sup>	Lieff Cabraser	38 (1974)	\$900	2012	\$1,107
Gordon Kirscher <sup>90</sup>	O'Melveny & Myers	38 (1971)	\$860	2009	\$1,156
Unnamed <sup>91</sup>	Paul Hastings	36 (1974)	\$940	2010	\$1,226
Unnamed <sup>84</sup>	Lieff Cabraser	34 (1978)	\$800	2012	\$984
Unnamed <sup>92</sup>	O'Melveny & Myers	34 (1975)	\$860	2009	\$1,156
Unnamed <sup>85</sup>	Paul Hastings	33 (1978)	\$940	2011	\$1,191



**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports</b>					
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Daniel Kolkey <sup>86</sup>	Gibson Dunn	32 (1977)	\$840	2009	\$1,129
Unnamed <sup>92</sup>	Pachulski, Stang et al.	32 (1977)	\$650	2009	\$874
Unnamed <sup>92</sup>	Hennigan, Bennett & Dorman	31 (1978)	\$680	2009	\$914
Unnamed <sup>92</sup>	Hennigan, Bennett & Dorman	30 (1979)	\$760	2009	\$1,021
Andrew Bridges <sup>98</sup>	Fenwick & West	29 (1986)	\$930	2014	\$1,078
Unnamed <sup>84</sup>	Lieff Cabraser	29 (1983)	\$775	2012	\$953
Arturo Gonzalez <sup>83</sup>	MoFo	28 (1985)	\$950	2013	\$1,134
Unnamed <sup>92</sup>	Pachulski, Stang et al.	27 (1982)	\$750	2009	\$1,008
Diana Torres <sup>97</sup>		26 (1992)	\$892	2018	\$919
Wayne Barsky <sup>86</sup>	Gibson Dunn	26 (1983)	\$905	2009	\$1,216
Unnamed <sup>92</sup>	Munger, Tolles & Olson	25 (1984)	\$550	2009	\$739
Brian J. Hennigan <sup>89</sup>	Irell & Manella	25 (1983)	\$775	2008	\$1,073
Unnamed <sup>92</sup>	Gibson Dunn & Crutcher	25 (1974)	\$790	2009	\$1,062
Marc Becker <sup>81</sup>	Quinn Emanuel	24 (1988)	\$1035	2012	\$1,273
Unnamed <sup>84</sup>	Lieff Cabraser	24 (1988)	\$775	2012	\$953
Unnamed <sup>92</sup>	White & Case	24 (1985)	\$750	2009	\$1,008
Unnamed <sup>92</sup>	Morrison & Foerster	24 (1985)	\$750	2009	\$1,008
Unnamed <sup>92</sup>	Pachulski, Stang et al.	24 (1985)	\$675	2009	\$907
Unnamed <sup>85</sup>	Paul Hastings	23 (1998)	\$850	2011	\$1,077

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports</b>					
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Christopher Cox <sup>95</sup>	Weil Gotshal	23 (1991)	\$850	2014	\$985
Unnamed <sup>92</sup>	Davis, Polk & Wardwell	23 (1986)	\$960	2009	\$1,290
Unnamed <sup>92</sup>	Weil, Gotscahl & Manges	23 (1986)	\$799	2009	\$1,074
Alejandro Mayorkas <sup>90</sup>	O'Melveny & Myers	23 (1986)	\$770	2009	\$1,035
Unnamed <sup>92</sup>	Pachulski, Stang et al.	22 (1987)	\$725	2009	\$974
Unnamed <sup>92</sup>	Munger, Tolles & Olson	22 (1987)	\$725	2009	\$974
Unnamed <sup>84</sup>	Lieff Cabraser	21 (1991)	\$700	2012	\$861
Marcellus McRae <sup>86</sup>	Gibson Dunn	21 (1988)	\$785	2009	\$1,055
Unnamed <sup>92</sup>	Munger, Tolles & Olson	21 (1988)	\$600	2009	\$806
Mark D. Kemple <sup>88</sup>	Greenberg Traurig	20 (1989)	\$675	2009	\$934
Unnamed <sup>92</sup>	Pachulski, Stang et al.	20 (1989)	\$645	2009	\$867
Unnamed <sup>11</sup>	Quinn Emanuel	20	\$700	2013	\$836
Yungmoon Chang <sup>97</sup>		2 (2016)	\$554	2018	\$571
Unnamed <sup>92</sup>	Davis, Polk & Wardwell	19 (1990)	\$955	2009	\$1,283
Unnamed <sup>92</sup>	Klee, Tuchin, Bogdanoff, & Stern	19 (1990)	\$850	2009	\$1,142
Glenn Peterson <sup>96</sup>	Millstone Peterson & Watts	18 (1996)	\$600	2014	\$696

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports</b>					
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Jason D. Russell <sup>82</sup>	Skadden Arps	18 (1993)	\$1030	2011	\$1,305
Unnamed <sup>92</sup>	Gibson Dunn & Crutcher	18 (1991)	\$610	2009	\$820
Unnamed <sup>92</sup>	Klee, Tuchin, Bogdanoff, & Stern	18 (1991)	\$590	2009	\$793
Michal H. Strub <sup>89</sup>	Irell & Manella	18 (1990)	\$670	2008	\$927
Paralegal <sup>90</sup>	O'Melveny & Myers	17 (2004)	\$310	2009	\$417
Ilana Rubel <sup>98</sup>	Fenwick & West	17 (1997)	\$750	2014	\$869
Jennifer Kelly <sup>98</sup>	Fenwick & West	17 (1997)	\$750	2014	\$869
Unnamed <sup>84</sup>	Lieff Cabraser	17 (1995)	\$650	2012	\$799
Unnamed <sup>85</sup>	Paul Hastings	17 (1994)	\$725	2011	\$918
Unnamed <sup>92</sup>	Morrison & Foerster	17 (1992)	\$650	2009	\$874
Amy Lalley <sup>94</sup>	Sidley Austin	16 (1998)	\$825	2014	\$956
Unnamed <sup>91</sup>	Paul Hastings	16 (1994)	\$725	2010	\$946
Diane Hutnyan <sup>81</sup>	Quinn Emanuel	15 (1997)	\$790	2012	\$972
Unnamed <sup>85</sup>	Paul Hastings	15 (1996)	\$725	2011	\$918
Unnamed <sup>92</sup>	Gibson Dunn & Crutcher	15 (1994)	\$525	2009	\$706
Danielle Gilmore <sup>87</sup>	Quinn Emanuel	15 (1993)	\$685	2008	\$948
Daniel Perry <sup>93</sup>	Milbank, Tweed	14 (2000)	\$1135	2014	\$1,316
Amy Lalley <sup>94</sup>	Sidley Austin	14 (1998)	\$700	2012	\$861
Unnamed <sup>84</sup>	Lieff Cabraser	14 (1998)	\$585	2012	\$719
Thomas M. Riordan <sup>90</sup>	O'Melveny & Myers	14 (1995)	\$675	2009	\$907

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports</b>					
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Unnamed <sup>92</sup>	Pachulski, Stang et al.	14 (1995)	\$535	2009	\$719
Victoria Maroulis <sup>81</sup>	Quinn Emanuel	13 (1999)	\$815	2012	\$1,002
Delilah Vinzon <sup>93</sup>	Milbank, Tweed	12 (2002)	\$900	2014	\$1,043
Todd Briggs <sup>81</sup>	Quinn Emanuel	12 (2000)	\$735	2012	\$904
Melissa Dalziel <sup>81</sup>	Quinn Emanuel	12 (2000)	\$730	2012	\$898
Unnamed <sup>85</sup>	Paul Hastings	12 (1999)	\$670	2011	\$849
Unnamed <sup>92</sup>	Klee, Tuchin, Bogdanoff, & Stern	12 (1997)	\$650	2009	\$874
Unnamed <sup>92</sup>	Gibson Dunn & Crutcher	12 (1997)	\$635	2009	\$853
Unnamed <sup>92</sup>	Munger, Tolles & Olson	12 (1997)	\$525	2009	\$706
Paralegal <sup>90</sup>	O'Melveny & Myers	12 (1997)	\$245	2009	\$329
Joseph Belichick <sup>98</sup>	Fenwick & West	11 (2003)	\$690	2014	\$800
Unnamed <sup>84</sup>	Lieff Cabraser	11 (2001)	\$525	2012	\$646
Unnamed <sup>91</sup>	Paul Hastings	11 (1999)	\$670	2010	\$874
Erik Swanholt <sup>88</sup>	Greenberg Traurig	11 (1998)	\$575	2009	\$796
Todd Gregorian <sup>98</sup>	Fenwick & West	10 (2005)	\$690	2014	\$800
Hillary A. Hamilton <sup>82</sup>	Skadden Arps	10 (2001)	\$710	2011	\$899
Unnamed <sup>91</sup>	Paul Hastings	10 (2000)	\$660	2010	\$861
Jorge DeNeve <sup>90</sup>	O'Melveny & Myers	10 (1998)	\$620	2009	\$833
Liwen Mah <sup>98</sup>	Fenwick & West	09 (2005)	\$690	2014	\$800
Unnamed <sup>11</sup>	Arnold & Porter	09 (2004)	\$625	2013	\$746

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports</b>					
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Unnamed <sup>85</sup>	Paul Hastings	09 (2002)	\$630	2011	\$798
Unnamed <sup>92</sup>	Morrison & Foerster	09 (2000)	\$535	2009	\$719
Unnamed <sup>92</sup>	Hennigan, Bennett & Dorman	09 (2000)	\$505	2009	\$679
Hannah Cannom <sup>93</sup>	Milbank, Tweed	08 (2006)	\$760	2014	\$881
Unnamed <sup>85</sup>	Paul Hastings	08 (2003)	\$620	2011	\$785
Unnamed <sup>92</sup>	White & Case	08 (2001)	\$655	2009	\$880
Allan Johnson <sup>90</sup>	O'Melveny & Myers	08 (2001)	\$565	2009	\$759
Jennifer J. Johnson <sup>98</sup>	Fenwick & West	07 (2007)	\$640	2014	\$742
Suzanna Brickman <sup>83</sup>	MoFo	07 (2006)	\$650	2013	\$776
Unnamed <sup>85</sup>	Paul Hastings	07 (2004)	\$590	2011	\$747
Revi-Ruth Enriquez <sup>93</sup>	Milbank, Tweed	06 (2008)	\$800	2014	\$927
Caitlin Hawks <sup>93</sup>	Milbank, Tweed	06 (2008)	\$760	2014	\$881
Alex Doherty <sup>94</sup>	Sidley Austin	06 (2008)	\$700	2014	\$811
Unnamed <sup>84</sup>	Lieff Cabraser	06 (2006)	\$435	2012	\$535
Unnamed <sup>85</sup>	Paul Hastings	06 (2005)	\$565	2011	\$716
Unnamed <sup>92</sup>	White & Case	06 (2003)	\$600	2009	\$806
Unnamed <sup>92</sup>	Weil, Gotscahl & Manges	06 (2003)	\$580	2009	\$779
Unnamed <sup>92</sup>	Gibson Dunn & Crutcher	06 (2003)	\$570	2009	\$766
Kathleen Lu <sup>98</sup>	Fenwick & West	05 (2009)	\$560	2014	\$649
Katherine Eklund <sup>93</sup>	Milbank, Tweed	05 (2009)	\$550	2014	\$638



**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports</b>					
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Unnamed <sup>85</sup>	Paul Hastings	05 (2006)	\$530	2011	\$671
Danielle Katzi <sup>86</sup>	Gibson Dunn	05 (2004)	\$525	2009	\$706
Paralegal <sup>90</sup>	O'Melveny & Myers	05 (2004)	\$225	2009	\$302
Dena G. Kaplan <sup>89</sup>	Irell & Manella	05 (2003)	\$475	2008	\$658
Bambo Obaro <sup>95</sup>	Weil Gotshal	04 (2010)	\$400	2014	\$464
Alex Doherty <sup>94</sup>	Sidley Austin	04 (2008)	\$520	2012	\$640
Unnamed <sup>84</sup>	Lieff Cabraser	04 (2008)	\$395	2012	\$486
Unnamed <sup>85</sup>	Paul Hastings	04 (2007)	\$500	2011	\$633
Unnamed <sup>92</sup>	Davis, Polk & Wardwell	04 (2005)	\$680	2009	\$914
Unnamed <sup>92</sup>	Weil, Gotscahl & Manges	04 (2005)	\$500	2009	\$672
Multiple associates <sup>86</sup>	Gibson Dunn	04 (2005)	\$495	2009	\$665
Unnamed <sup>92</sup>	Munger, Tolles & Olson	04 (2005)	\$450	2009	\$605
Unnamed <sup>92</sup>	Munger, Tolles & Olson	04 (2005)	\$435	2009	\$585
Unnamed <sup>92</sup>	White & Case	04 (2004)	\$600	2009	\$806
Kimberly A. Svendsen <sup>89</sup>	Irell & Manella	04 (2004)	\$410	2008	\$568
Unnamed <sup>92</sup>	Munger, Tolles & Olson	04 (2004)	\$395	2009	\$531
Annasara Purcell <sup>98</sup>	Fenwick & West	03 (2011)	\$505	2014	\$585

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports</b>					
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Unnamed <sup>85</sup>	Paul Hastings	03 (2008)	\$450	2011	\$570
Melissa Barshop <sup>86</sup>	Gibson Dunn	03 (2006)	\$470	2009	\$632
Unnamed <sup>92</sup>	Gibson Dunn & Crutcher	03 (2006)	\$470	2009	\$632
Unnamed <sup>92</sup>	Weil, Gotscahl & Manges	03 (2006)	\$465	2009	\$625
Abby Schwartz <sup>90</sup>	O'Melveny & Myers	03 (2006)	\$450	2009	\$605
Hirad Dadgostar <sup>88</sup>	Greenberg Traurig	03 (2006)	\$400	2008	\$554
Unnamed <sup>92</sup>	Munger, Tolles & Olson	03 (2006)	\$400	2009	\$538
Unnamed <sup>92</sup>	O'Melveny & Myers	03 (2006)	\$395	2009	\$531
Armen Nercessian <sup>98</sup>	Fenwick & West	02 (2012)	\$450	2014	\$522
Multiple associates <sup>86</sup>	Gibson Dunn	02 (2007)	\$400	2009	\$538
Sara Brenner <sup>87</sup>	Quinn Emanuel	02 (2006)	\$340	2008	\$471
Lauren McCray <sup>94</sup>	Sidley Austin	02 (1998)	\$495	2014	\$574
Unnamed <sup>84</sup>	Lieff Cabraser	01 (2011)	\$325	2012	\$400
Shannon Kumagai <sup>98</sup>	Fenwick & West	01 (2014)	\$370	2014	\$429
Jessica Mohr <sup>95</sup>	Weil Gotshal	01 (2013)	\$300	2014	\$348
Unnamed <sup>85</sup>	Paul Hastings	01 (2010)	\$360	2011	\$456
Unnamed <sup>92</sup>	Weil, Gotscahl & Manges	01 (2008)	\$355	2009	\$477
Multiple associates <sup>86</sup>	Gibson Dunn	01 (2008)	\$345	2009	\$464
Lauren McCray <sup>94</sup>	Sidley Austin	01 (1998)	\$340	2012	\$418

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports</b>					
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Unnamed <sup>11</sup>	Quinn Emanuel		\$821	2013	\$980
Unnamed <sup>11</sup>	Quinn Emanuel		\$448	2013	\$535
Sr. Paralegal <sup>91</sup>	Paul Hastings		\$330	2010	\$431
Paralegal <sup>86</sup>	Gibson Dunn		\$315	2009	\$423
Paralegal <sup>86</sup>	Gibson Dunn		\$300	2009	\$403
Paralegal <sup>86</sup>	Gibson Dunn		\$295	2009	\$396
Legal Assistant <sup>82</sup>	Skadden Arps		\$295	2011	\$374
Paralegal <sup>87</sup>	Quinn Emanuel		\$235	2008	\$325

**III. RATES FROM SECTION I ORGANIZED FROM HIGH TO LOW**

**A. Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks**

<b>Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks</b>					
<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Ian Herzog <sup>24</sup>	Law Office of Ian Herzog	44 (1967)	\$1,000	2011	\$1,267
Jose R. Allen <sup>35</sup>	Skadden, Arps	31 (1985)	\$1150	2016	\$1,257
Barrett S. Litt <sup>38</sup>	KMBL	49 (1969)	\$1,150	2017	\$1,220
Jose R. Allen <sup>4</sup>	Skadden Arps	25 (1985)	\$930	2010	\$1,213
Barrett S. Litt <sup>40</sup>	KMBL	49 (1969)	\$1,150	2018	\$1,185
Barrett S. Litt <sup>34</sup>	KMBL	45 (19690	\$975	2014	\$1,130

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 1: Civil Rights Lodestar Awards/Crosschecks</b>					
<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Sid Wolinsky <sup>4</sup>	DRA*	49 (1961)	\$835	2010	\$1,089
Paul R. Fine <sup>24</sup>	Daniels, Fine, Israel, Schonbuch & Lebovits	39 (1972)	\$850	2011	\$1,077
Barrett S. Litt <sup>6</sup>	Litt, Estuar & Kitson	40 (1969)	\$800	2009	\$1,075
Sid Wolinsky <sup>13</sup>	DRA*	51 (1961)	\$860	2012	\$1,058
Barrett S. Litt <sup>8</sup>	Litt, Estuar & Kitson	43 (1969)	\$850	2012	\$1,045
Unnamed <sup>10</sup>	Rosen Bien & Galvan	48 (1962)	\$800	2010	\$1,044
Barrett S. Litt <sup>15</sup>	Litt, Estuar & Kitson	39 (1969)	\$750	2008	\$1,038
Barrett S. Litt <sup>7</sup>	Litt, Estuar & Kitson	38 (1969)	\$725	2007	\$1,034
Dan Stormer <sup>8</sup>	HSKRR****	38 (1974)	\$825	2012	\$1,015
Bill Lann Lee <sup>18</sup>	Lewis, Feinberg, Lee, Renaker, & Jackson	38 (1974)	\$825	2012	\$1,015
Stephen Glick <sup>24</sup>	Law Offices of Stephen Glick	37 (1974)	\$800	2011	\$1,013
Paul L. Hoffman <sup>6</sup>	Schonbrun, de Simone	33 (1976)	\$750	2009	\$1,008
Mark Rosenbaum <sup>2</sup>	ACLU	35 (1974)	\$740	2009	\$994
Christopher Cox <sup>29</sup>	Weill Gotschall	23 (1991)	\$850	2014	\$985
Larry Paradis <sup>13</sup>	DRA*	27 (1985)	\$800	2012	\$984
Sanford J. Rosen <sup>12</sup>	Rosen Bien & Galvan	46 (1962)	\$700	2008	\$969
Daniel B. Kohrman <sup>4</sup>	AFL*****	26 (1984)	\$740	2010	\$966
Carol Sobel <sup>2</sup>	Law Ofc Carol Sobel	31 (1978)	\$710	2009	\$954
Carol A. Sobel <sup>6</sup>	Law Offices of Carol Sobel	31 (1978)	\$710	2009	\$954
Laurence Paradis <sup>4</sup>	DRA*	26 (1985)	\$730	2010	\$952
Carol Sobel <sup>21</sup>	Law Office of Carol Sobel	32 (1978)	\$725	2010	\$946

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks</b>					
<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Paula Pearlman <sup>37</sup>	DRLC	35 (1982)	\$875	2017	\$928
Paula Pearlman <sup>39</sup>	DRLC	35 (1982)	\$875	2017	\$928
Dale Galipo <sup>32</sup>	Law Ofc Dale Galipo	25 (1989)	\$800	2014	\$927
Dale Galipo <sup>33</sup>	Law Ofc Dale Galipo	25 (1989)	\$800	2014	\$927
Matthew Righetti <sup>19</sup>	Righetti Glugoski	27 (1985)	\$750	2012	\$922
Robert Rubin <sup>20</sup>	LCCR	28 (1978)	\$625	2006	\$918
Unnamed <sup>10</sup>	Prison Law Office	32 (1978)	\$700	2010	\$913
Unnamed <sup>10</sup>	Bingham, McCutcheon	32 (1978)	\$700	2010	\$913
Lisa Jaskol <sup>38</sup>	Public Counsel	30 (1988)	\$850	2017	\$902
Anne Richardson <sup>38</sup>	Public Counsel	29 (1989)	\$850	2017	\$902
David M. McLane <sup>40</sup>	KMBL	32 (1986)	\$875	2018	\$901
Ronald O. Kaye <sup>40</sup>	KMBL	30 (1988)	\$875	2018	\$901
David M. McLane <sup>34</sup>	KMBL	28 (1988)	\$775	2014	\$898
Ronald O. Kaye <sup>34</sup>	KMBL	25 (1989)	\$775	2014	\$898
Ronald K. Tellis <sup>30</sup>	Baron & Budd	18 (1996)	\$775	2014	\$898
Ron Eisberry <sup>13</sup>	DRA*	25 (1987)	\$725	2012	\$892
Michael Bien <sup>9</sup>	Rosen Bien Galvan & Grunfeld	28 (2008)	\$640	2008	\$886
Angela Padilla <sup>20</sup>	MoFo	15 (1991)	\$600	2006	\$881
Richard Pearl <sup>27</sup>		44 (1970)	\$750	2014	\$869
David Borgen <sup>35</sup>	Goldstein Borgen Dardarian	35 (1981)	\$795	2016	\$869
Amirai Schwartz <sup>11</sup>	Law Offices of Amirai Schwartz	40 (1973)	\$725	2013	\$866



**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks</b>						
<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>	
John Houston Scott <sup>11</sup>	Scott Law Firm	37 (1976)	\$725	2013	\$866	
Thomas P. Greerty <sup>11</sup>	Law Offices of Thomas P. Greerty	34 (1979)	\$725	2013	\$866	
Jim DeSimone <sup>28</sup>	Schonbrun, de Simone	28 (1985)	\$725	2013	\$866	
Dale Galipo <sup>16</sup>	Law Ofc of Dale Galipo	23 (1989)	\$700	2012	\$861	
Michelle Uzeta <sup>13</sup>	DRLC***	20 (1992)	\$700	2012	\$861	
Julie Nepveu <sup>4</sup>	AFL*****	19 (1991)	\$660	2010	\$861	
Matthew McNicholas <sup>17</sup>	McNicholas & McNicholas	15 (1997)	\$700	2012	\$861	
James de Simone <sup>3</sup>	Schonbrun, de Simon	27 (1985)	\$695	2012	\$855	
Unnamed <sup>10</sup>	Bingham, McCutcheon	13 (1997)	\$655	2010	\$855	
Ben Schonbrun <sup>5</sup>	Schonbrun, de Simone	25 (1985)	\$650	2010	\$848	
Melissa Kasnitz <sup>4</sup>	DRA*	18 (1992)	\$650	2010	\$848	
Linda Dardarian <sup>35</sup>	Goldstein Borgen Dardarian	29 (1987)	\$775	2016	\$847	
Michael Haddad <sup>27</sup>	Haddad & Sherwin	23 91991)	\$725	2014	\$840	
Earnest Bell <sup>15</sup>	Law Offices of Earnest Bell	20 (1988)	\$600	2008	\$831	
Scott A. Brooks <sup>24</sup>	Daniels, Fine, Israel, Schonbuch & Lebovits	19 (1992)	\$650	2011	\$823	
Guy Wallace <sup>35</sup>	Schneider Wallace	23 (1993)	\$750	2016	\$820	
Brian Dunn <sup>36</sup>	Cochran Firm	21 (1995)	\$750	2016	\$820	
Shawna Parks <sup>13</sup>	DRA*	13 (1999)	\$665	2012	\$818	
Paul Estuar <sup>38</sup>	KMBL	25 (1993)	\$765	2017	\$812	
Timothy G. Blood <sup>30</sup>	Blood Hurst and O'Reardon	24 (1990)	\$695	2014	\$806	

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks</b>					
<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Dale Galipo <sup>26</sup>	Law Ofc Dale Galipo	24 (1989)	\$675	2013	\$806
Julia Sherwin <sup>27</sup>	Haddad & Sherwin	19 (1995)	\$695	2014	\$806
John Glugoski <sup>19</sup>	Righetti Glugoski	12 (1997)	\$650	2012	\$799
Pat Dunlevy <sup>38</sup>	KMBL	26 (1992)	\$750	2017	\$796
Patrick Dunlevy <sup>38</sup>	Public Counsel	26 (1992)	\$750	2017	\$796
Hernan Vera <sup>38</sup>	Public Counsel	24 (1994)	\$750	2017	\$796
Shawna Parks <sup>37</sup>	DRLC	18 (1999)	\$745	2017	\$790
Michael Seplow <sup>28</sup>	Schonbrun, de Simone	23 (1990)	\$660	2013	\$788
Michael Seplow <sup>3</sup>	Schonbrun, de Simon	22 (1990)	\$630	2012	\$775
Paul Hughes <sup>38</sup>	Mayer, Brown	10 (2008)	\$730	2017	\$774
Anne Richardson <sup>2</sup>	HSKRR***	20 (1989)	\$575	2009	\$773
Michael Seplow <sup>5</sup>	Schonbrun, de Simone	20 (1990)	\$590	2010	\$770
Bryan M. Miller <sup>8</sup>	Litt, Estuar & Kitson	18 (1994)	\$625	2012	\$769
Robert M. Kitson <sup>8</sup>	Litt, Estuar & Kitson	17 (1995)	\$625	2012	\$769
Susan Abitanta <sup>24</sup>	Law Office of Ian Herzog	28 (1983)	\$600	2011	\$760
Hector O. Villagra <sup>1</sup>	ACLU	17 (1994)	\$600	2011	\$760
Shawna Parks <sup>35</sup>	Law Ofc Shawna Parks	17 (1999)	\$695	2016	\$759
Todd Burns <sup>23</sup>	Law Office of Todd Burns	18 (1996)	\$650	2014	\$754
Rebecca Grey <sup>25</sup>		16 (1998)	\$650	2014	\$754
Gene J. Stonebarger <sup>31</sup>	Stonebarger Law, APC	14 (2000)	\$650	2014	\$754
Jennifer Bezoza <sup>4</sup>	DRA*	10 (2000)	\$570	2010	\$744
Robert Dell Angelo <sup>14</sup>	MTO**	17 (1992)	\$550	2009	\$739
Douglas D. Winter <sup>17</sup>	McNicholas & McNicholas	22 (1990)	\$600	2012	\$738
Katherine Weed <sup>13</sup>	DRA*	10 (2002)	\$600	2012	\$738

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks</b>						
<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>	
Melissa Goodman <sup>40</sup>	ACLU	15 (2003)	\$715	2018	\$736	
Unnamed <sup>10</sup>	Rosen Bien & Galvan	13 (1997)	\$560	2010	\$731	
Roger Heller <sup>4</sup>	DRA *	09 (2001)	\$560	2010	\$731	
Maronel Barajas <sup>37</sup>	DRLC	14 (2003)	\$675	2017	\$716	
Peter Eliasberg <sup>2</sup>	ACLU	15 (1994)	\$525	2009	\$706	
Shawna Parks <sup>14</sup>	DRLC	10 (1999)	\$525	2009	\$706	
Matthew Stugar <sup>37</sup>	DRLC	13 (2004)	\$660	2017	\$700	
Kevin Knestrick <sup>4</sup>	DRA *	07 (2003)	\$535	2010	\$698	
Joseph J. Ybarra <sup>1</sup>	MTO**	10 (2001)	\$550	2011	\$697	
Kevin LaHue <sup>34</sup>	KMBL	10 (2004)	\$600	2014	\$696	
Nathaniel Fisher <sup>4</sup>	Skadden Arps	02 (2008)	\$530	2010	\$692	
Paul Estuar <sup>7</sup>	Litt, Estuar & Kitson	14 (1993)	\$485	2007	\$691	
Douglas Ingraham <sup>28</sup>	Schonbrun, de Simone	15 (1998)	\$575	2013	\$687	
John Raphling <sup>5</sup>	Schonbrun, de Simone	17 (1993)	\$525	2010	\$685	
Mary-Lee Smith <sup>13</sup>	DRA *	07 (2005)	\$555	2012	\$683	
Stephanie Carroll <sup>38</sup>	Public Counsel	14 (2004)	\$640	2017	\$679	
Umbreen Bhatti <sup>37</sup>	DRLC	12 (2005)	\$640	2017	\$679	
Jennifer Lee <sup>13</sup>	DRLC***	09 (2003)	\$550	2012	\$676	
Belinda Escobosa Helzer <sup>1</sup>	ACLU	11 (2000)	\$525	2011	\$665	
Carly Munson <sup>37</sup>	DRLC	11 (2006)	\$625	2017	\$663	
Amanda Goad <sup>40</sup>	ACLU	13 (2005)	\$640	2018	\$659	
Kasey Corbit <sup>4</sup>	DRA *	06 (2004)	\$500	2010	\$652	
Matthew Stugar <sup>13</sup>	DRLC***	08 (2004)	\$525	2012	\$646	

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks</b>					
<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Jacob A. Kreilkamp <sup>1</sup>	MTO**	08 (2003)	\$505	2011	\$640
Sage Reeves <sup>14</sup>	DRLC	08 (2001)	\$475	2009	\$638
Andrea Oxman <sup>37</sup>	DRLC	10 (2007)	\$600	2017	\$637
Peter Bibring <sup>1</sup>	ACLU	09 (2002)	\$490	2011	\$621
Mary-Lee Kimber <sup>4</sup>	DRA*	05 (2005)	\$475	2010	\$620
Lindsay Battles <sup>40</sup>	KMBL	10 (2008)	\$600	2018	\$618
Humberto Guizar <sup>16</sup>		26 (1986)	\$500	2012	\$615
Catherine Schmidt <sup>17</sup>	McNicholas & McNicholas	11 (2001)	\$500	2012	\$615
Rebecca Thornton <sup>21</sup>	Law Office of Carol Sobel	09 (2001)	\$450	2010	\$587
Laura D. Smolowe <sup>1</sup>	MTO**	05 (2006)	\$460	2011	\$583
Richard D. Lambert <sup>31</sup>	Stonebarger Law	07 (2007)	\$500	2014	\$580
Caitlin Weisberg <sup>34</sup>	KMBL	06 (2008)	\$500	2014	\$580
Adelaide Anderson <sup>38</sup>	Public Counsel	8 (2010)	\$540	2017	\$573
Rebecca Thornton <sup>6</sup>	Law Offices of Carol Sobel	08 (2001)	\$425	2009	\$571
Elliot Field <sup>37</sup>	DRLC	08 (2009)	\$525	2017	\$557
Anna Canning <sup>3</sup>	Schonbrun, de Simon	06 (2006)	\$450	2012	\$553
Debra Patkin <sup>13</sup>	DRLC***	05 (2007)	\$450	2012	\$553
Matthew Strugar <sup>14</sup>	DRLC	05 (2004)	\$400	2009	\$538
Moirra Duvernay <sup>11</sup>	Law Offices of Amitai Schwartz	09 (2004)	\$450	2013	\$537
Bethany Woodard <sup>14</sup>	MTO**	04 (2005)	\$395	2009	\$531
Karla Gilbride <sup>13</sup>	DRA*	05 (2007)	\$430	2012	\$529
Stephanie Biedermann <sup>13</sup>	DRA*	05 (2007)	\$430	2012	\$529

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks</b>					
<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Christine Chuang <sup>13</sup>	DRA *	05 (2007)	\$430	2012	\$529
Unnamed <sup>10</sup>	Bingham, McCutcheon	02 (2008)	\$400	2010	\$522
Sheryl Wu Leung <sup>4</sup>	Skadden Arps	05 (2005)	\$395	2010	\$515
Craig Momita <sup>24</sup>	Daniels, Fine, Israel, Schonbuch & Lebovits	18 (1993)	\$400	2011	\$507
Peter Bibring <sup>2</sup>	ACLU	07 (2002)	\$375	2009	\$504
Heather McGunigle <sup>22</sup>	DRLC	04 (2009)	\$375	2009	\$504
Brendan Hamme <sup>40</sup>	ACLU	06 (2012)	\$480	2018	\$494
Marina A. Torres <sup>1</sup>	MTO**	03 (2008)	\$385	2011	\$488
Sarala V. Nagala <sup>1</sup>	MTO**	03 (2008)	\$385	2011	\$488
Sanjukt Paul <sup>2</sup>	HSKRR****	06 (2003)	\$350	2009	\$470
Kristina Wilson <sup>14</sup>	MTO**	03 (2006)	\$350	2009	\$470
Genevieve Guertin <sup>27</sup>	Haddad & Sherwin	05 (2009)	\$400	2014	\$464
Bambo Obarro <sup>29</sup>	Weill Gotschall	04 (2010)	\$400	2014	\$464
Stephanie Biedermann <sup>4</sup>	DRA *	03 (2007)	\$350	2010	\$457
Mahogany Jenkins <sup>20</sup>	MoFo	02 (2004)	\$285	2006	\$419
Technology manager <sup>4</sup>	Skadden Arps		\$320	2010	\$418
Gina Altomare <sup>27</sup>	Haddad & Sherwin	04 (2010)	\$350	2014	\$406
Kara Janssen <sup>13</sup>	DRA *	02 (2010)	\$330	2012	\$406
Tasha Hill <sup>40</sup>	ACLU	04 (2014)	\$390	2018	\$402
Aditi Fruitwala <sup>40</sup>	ACLU	04 (2014)	\$390	2018	\$402
Stacey Brown <sup>7</sup>	Litt, Estuar & Kitson	01 (2006)	\$275	2007	\$392



**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks</b>					
<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Thomas Kennedy Helm <sup>27</sup>	Haddad & Sherwin	02 (2012)	\$325	2014	\$377
Legal assistant <sup>4</sup>	Skadden Arps		\$285	2010	\$372
Unnamed <sup>10</sup>	Prison Law Office	01 (2009)	\$275	2010	\$359
Julia White <sup>38</sup> [Sr. Paralegal]	KMBL		\$335	2017	\$355
Becca von Behren <sup>4</sup>	DRA *	02 (2008)	\$265	2010	\$346
Senior paralegals <sup>4</sup>	DRA *		\$265	2010	\$346
Julia White <sup>40</sup> [Sr. Paralegal]	KMBL		\$335	2018	\$345
Julia White <sup>34</sup> [Sr. Paralegal]	KMBL		\$295	2014	\$342
Sr. Paralegal <sup>15</sup>	Litt, Estuar & Kitson		\$235	2008	\$325
Senior Paralegals <sup>7</sup>	Litt, Estuar & Kitson		\$225	2007	\$321
Summer associates <sup>4</sup>	DRA *		\$245	2010	\$320
ALS <sup>1</sup>	MTO**		\$250	2011	\$317
Sr. paralegal <sup>10</sup>	Rosen Bien & Galvan		\$240	2010	\$313
Sr. paralegal <sup>8</sup>	Litt, Estuar & Kitson		\$250	2012	\$307
Paralegal	DRA *		\$240	2012	\$307
Law Clerks <sup>14</sup>	MTO**		\$220	2009	\$296
Summer Associates <sup>13</sup>	DRA *		\$250	2012	\$295
Paralegals <sup>4</sup>	DRA *		\$225	2010	\$294
Law Clerk <sup>13</sup>	DRLC***		\$230	2012	\$283
Litigation Assist <sup>13</sup>	DRLC***		\$230	2012	\$283

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks</b>					
<b>Attorney</b>	<b>Firm</b>	<b>Pract Yrs (Grad Yr)</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Law student interns <sup>8</sup>	Litt, Estuar & Kitson		\$225	2012	\$277
Heath White <sup>34</sup> [High Tech Paralegal]	KMBL		\$235	2014	\$272
Paralegal <sup>1</sup>	MTO**		\$210	2011	\$266
Law Clerks <sup>37</sup>	DRLC		\$250	2017	\$265
Paralegal <sup>20</sup>	MoFo		\$175	2006	\$257
Paralegal <sup>1</sup>	ACLU		\$200	2011	\$253
Law student interns <sup>3</sup>	Schonbrun, de Simon		\$200	2012	\$246
Sujata Awasthi <sup>40</sup> [Law Clerk]	ACLU		\$225	2018	\$232
Evan Ettinghoff <sup>40</sup> [Law Clerk]	KMBL		\$225	2018	\$232
Paralegals (not senior) <sup>27</sup>	Haddad & Sherwin		\$200	2014	\$232
Law clerks <sup>4</sup>	DRA*		\$175	2010	\$228
Case clerks <sup>4</sup>	DRA*		\$165	2010	\$215
Jackie Chidiac <sup>38</sup> [Paralegal]	Public Counsel		\$200	2017	\$212
Maria Cabadas <sup>38</sup> [Litigation Coordinator]	Public Counsel		\$190	2017	\$202
Diana Gonzalez <sup>40</sup> [Paralegal]	ACLU		\$195	2018	\$201

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Attorney	Firm	Pract Yrs (Grad Yr)	Rate	Year	Adjusted Rate
Rene Arriaza <sup>40</sup>	KMBL		\$175	2018	\$180
[Paralegal]					

**B. Table 2: Consumer/Wage & Hour Class Action Lodestar Crosschecks**

Table 2: Consumer/Wage & Hour Class Action Lodestar Crosschecks						
Atty	Firm	Practice Yrs [Grad Yr]	Rate	Year	Adjusted Rate	
Paul Kiesel <sup>59</sup>	Kiesel Law LLP	30 [1985]	\$1,100	2015	\$1,238	
Richard Heimann <sup>60</sup>	Leiff Cabraser Heimann & Bernstein	40 (1975)	\$900	2015	\$1,013	
Eric L. Cramer <sup>60</sup>	Berger Montague	22 (1990)	\$900	2015	\$1,013	
Daniel Girard <sup>60</sup>	Girard Gibbs	31 (1984)	\$845	2015	\$951	
Kelly Dermody <sup>60</sup>	Leiff Cabraser Heimann & Bernstein	21 (1994)	\$800	2015	\$900	
Eric Gibbs <sup>55</sup>	Girard Gibbs	15 (1995)	\$675	2010	\$881	
Eric Gibbs <sup>56</sup>	Girard Gibbs	15 (1995)	\$675	2010	\$881	
Jonathan E. Gertler <sup>52</sup>	Chavez & Gertler	31 (1983)	\$725	2013	\$866	
Todd Schneider <sup>54</sup>	Schneider Wallace	29 (1982)	\$675	2011	\$855	
Guy Wallace <sup>51</sup>	Schneider Wallace	17 (1993)	\$650	2010	\$848	
Patrick N. Keegan <sup>53</sup>	Keegan & Baker LLP	20 (1993)	\$695	2013	\$830	

RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES

Table 2: Consumer/Wage & Hour Class Action Lodestar Crosschecks						
Atty	Firm	Practice Yrs [Grad Yr]	Rate	Year	Adjusted Rate	
Josh Konecky <sup>51</sup>	Schneider Wallace	14 (1996)	\$625	2010	\$815	
Jonathan Selbin <sup>57</sup>	Lieff Cabraser	16 [1993]	\$600	2009	\$806	
Shawn Khorrami <sup>58</sup>	Khorrami Boucher Summer Sanguinetti, LLP	19 (1995)	\$650	2014	\$754	
Amanda Steiner <sup>60</sup>	Girard Gibbs	18 (1997)	\$650	2015	\$732	
Dylan Hughes <sup>55</sup>	Girard Gibbs	10 (2000)	\$545	2010	\$711	
Jeffrey A. Koncius <sup>59</sup>	Kiesel Law LLP	18 [1997]	\$625	2015	\$703	
Dan L. Gildor <sup>52</sup>	Chavez & Gertler	12 (2002)	\$550	2013	\$657	
Launa Adolph <sup>58</sup>	Khorrami Boucher Summer Sanguinetti, LLP	11 (2003)	\$495	2014	\$574	
Matthew A. Young <sup>59</sup>	Kiesel Law LLP	06 [2009]	\$375	2015	\$422	

C. Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	Firm	Practice Yrs [Grad Yr]	Rate	Year	Adjusted Rate
Thomas J. Nolan <sup>82</sup>	Skadden Arps	40 (1971)	\$1095	2011	\$1,387
Daniel Perry <sup>93</sup>	Millbank, Tweed	14 (2000)	\$1135	2014	\$1,316
Jason D. Russell <sup>82</sup>	Skadden Arps	18 (1993)	\$1030	2011	\$1,305

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports</b>					
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Unnamed <sup>92</sup>	Davis, Polk & Wardwell	23 (1986)	\$960	2009	\$1,290
Unnamed <sup>92</sup>	Davis, Polk & Wardwell	19 (1990)	\$955	2009	\$1,283
Marc Becker <sup>81</sup>	Quinn Emanuel	24 (1988)	\$1035	2012	\$1,273
Unnamed <sup>91</sup>	Paul Hastings	36 (1974)	\$940	2010	\$1,226
Wayne Barsky <sup>86</sup>	Gibson Dunn	26 (1983)	\$905	2009	\$1,216
Unnamed <sup>85</sup>	Paul Hastings	33 (1978)	\$940	2011	\$1,191
Gordon Kirscher <sup>90</sup>	O'Melveny & Myers	38 (1971)	\$860	2009	\$1,156
Unnamed <sup>92</sup>	O'Melveny & Myers	34 (1975)	\$860	2009	\$1,156
Unnamed <sup>92</sup>	Klee, Tuchin, Bogdanoff, & Stern	19 (1990)	\$850	2009	\$1,142
Arturo Gonzalez <sup>83</sup>	MoFo	28 (1985)	\$950	2013	\$1,134
Daniel Kolkey <sup>86</sup>	Gibson Dunn	32 (1977)	\$840	2009	\$1,129
Unnamed <sup>84</sup>	Lieff Cabraser	42 (1970)	\$900	2012	\$1,107
Unnamed <sup>84</sup>	Lieff Cabraser	38 (1974)	\$900	2012	\$1,107
Unnamed <sup>11</sup>	Arnold & Porter	39 (1974)	\$910	2013	\$1,087
Andrew Bridges <sup>98</sup>	Fenwick & West	29 (1986)	\$930	2014	\$1,078
Unnamed <sup>85</sup>	Paul Hastings	23 (1998)	\$850	2011	\$1,077
Unnamed <sup>92</sup>	Weil, Gotscahl & Manges	23 (1986)	\$799	2009	\$1,074
Brian J. Hennigan <sup>89</sup>	Irell & Manella	25 (1983)	\$775	2008	\$1,073



**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports</b>					
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Unnamed <sup>92</sup>	Gibson Dunn & Crutcher	25 (1974)	\$790	2009	\$1,062
Marcellus McRae <sup>86</sup>	Gibson Dunn	21 (1988)	\$785	2009	\$1,055
Delilah Vinzon <sup>93</sup>	Milbank, Tweed	12 (2002)	\$900	2014	\$1,043
Alejandro Mayorkas <sup>90</sup>	O'Melveny & Myers	23 (1986)	\$770	2009	\$1,035
Unnamed <sup>92</sup>	Hennigan, Bennett & Dorman	30 (1979)	\$760	2009	\$1,021
Unnamed <sup>92</sup>	Pachulski, Stang et al.	27 (1982)	\$750	2009	\$1,008
Unnamed <sup>92</sup>	White & Case	24 (1985)	\$750	2009	\$1,008
Unnamed <sup>92</sup>	Morrison & Foerster	24 (1985)	\$750	2009	\$1,008
Victoria Maroulis <sup>81</sup>	Quinn Emanuel	13 (1999)	\$815	2012	\$1,002
Christopher Cox <sup>95</sup>	Weil Gotshal	23 (1991)	\$850	2014	\$985
Unnamed <sup>84</sup>	Lieff Cabraser	34 (1978)	\$800	2012	\$984
Unnamed <sup>11</sup>	Quinn Emanuel		\$821	2013	\$980
Unnamed <sup>92</sup>	Pachulski, Stang et al.	22 (1987)	\$725	2009	\$974
Unnamed <sup>92</sup>	Munger, Tolles & Olson	22 (1987)	\$725	2009	\$974
Diane Hutnyan <sup>81</sup>	Quinn Emanuel	15 (1997)	\$790	2012	\$972
Amy L alley <sup>94</sup>	Sidley Austin	16 (1998)	\$825	2014	\$956
Unnamed <sup>84</sup>	Lieff Cabraser	29 (1983)	\$775	2012	\$953
Unnamed <sup>84</sup>	Lieff Cabraser	24 (1988)	\$775	2012	\$953
Danielle Gilmore <sup>87</sup>	Quinn Emanuel	15 (1993)	\$685	2008	\$948
Unnamed <sup>91</sup>	Paul Hastings	16 (1994)	\$725	2010	\$946

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports</b>					
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Mark D. Kemple <sup>88</sup>	Greenberg Traurig	20 (1989)	\$675	2009	\$934
Michal H. Strub <sup>89</sup>	Irell & Manella	18 (1990)	\$670	2008	\$927
Revi-Ruth Enriquez <sup>93</sup>	Milbank, Tweed	06 (2008)	\$800	2014	\$927
Diana Torres <sup>97</sup>		26 (1992)	\$892	2018	\$919
Unnamed <sup>85</sup>	Paul Hastings	17 (1994)	\$725	2011	\$918
Unnamed <sup>85</sup>	Paul Hastings	15 (1996)	\$725	2011	\$918
Unnamed <sup>92</sup>	Hennigan, Bennett & Dorman	31 (1978)	\$680	2009	\$914
Unnamed <sup>92</sup>	Davis, Polk & Wardwell	04 (2005)	\$680	2009	\$914
Unnamed <sup>92</sup>	Pachulski, Stang et al.	24 (1985)	\$675	2009	\$907
Thomas M. Riordan <sup>90</sup>	O'Melveny & Myers	14 (1995)	\$675	2009	\$907
Todd Briggs <sup>81</sup>	Quinn Emanuel	12 (2000)	\$735	2012	\$904
Hillary A. Hamilton <sup>82</sup>	Skadden Arps	10 (2001)	\$710	2011	\$899
Melissa Dalziel <sup>81</sup>	Quinn Emanuel	12 (2000)	\$730	2012	\$898
Hannah Cannom <sup>93</sup>	Milbank, Tweed	08 (2006)	\$760	2014	\$881
Caitlin Hawks <sup>93</sup>	Milbank, Tweed	06 (2008)	\$760	2014	\$881
Unnamed <sup>92</sup>	White & Case	08 (2001)	\$655	2009	\$880
Unnamed <sup>92</sup>	Pachulski, Stang et al.	32 (1977)	\$650	2009	\$874
Unnamed <sup>92</sup>	Morrison & Foerster	17 (1992)	\$650	2009	\$874
Unnamed <sup>92</sup>	Klee, Tuchin, Bogdanoff, & Stern	12 (1997)	\$650	2009	\$874
Unnamed <sup>91</sup>	Paul Hastings	11 (1999)	\$670	2010	\$874

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports</b>					
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
liana Rubel <sup>98</sup>	Fenwick & West	17 (1997)	\$750	2014	\$869
Jennifer Kelly <sup>98</sup>	Fenwick & West	17 (1997)	\$750	2014	\$869
Unnamed <sup>92</sup>	Pachulski, Stang et al.	20 (1989)	\$645	2009	\$867
Unnamed <sup>84</sup>	Lieff Cabraser	21 (1991)	\$700	2012	\$861
Amy L alley <sup>94</sup>	Sidley Austin	14 (1998)	\$700	2012	\$861
Unnamed <sup>91</sup>	Paul Hastings	10 (2000)	\$660	2010	\$861
Unnamed <sup>92</sup>	Gibson Dunn & Crutcher	12 (1997)	\$635	2009	\$853
Unnamed <sup>85</sup>	Paul Hastings	12 (1999)	\$670	2011	\$849
Unnamed <sup>92</sup>	Munger, Tolles & Olson	39 (1970)	\$625	2009	\$840
Unnamed <sup>11</sup>	Quinn Emanuel	20	\$700	2013	\$836
Jorge DeNeve <sup>90</sup>	O'Melveny & Myers	10 (1998)	\$620	2009	\$833
Unnamed <sup>92</sup>	Gibson Dunn & Crutcher	18 (1991)	\$610	2009	\$820
Alex Doherty <sup>94</sup>	Sidley Austin	06 (2008)	\$700	2014	\$811
Unnamed <sup>92</sup>	Munger, Tolles & Olson	21 (1988)	\$600	2009	\$806
Unnamed <sup>92</sup>	White & Case	06 (2003)	\$600	2009	\$806
Unnamed <sup>92</sup>	White & Case	04 (2004)	\$600	2009	\$806
Joseph Belichick <sup>98</sup>	Fenwick & West	11 (2003)	\$690	2014	\$800
Todd Gregorian <sup>98</sup>	Fenwick & West	10 (2005)	\$690	2014	\$800
Liwen Mah <sup>98</sup>	Fenwick & West	09 (2005)	\$690	2014	\$800

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports</b>					
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Unnamed <sup>84</sup>	Lieff Cabraser	17 (1995)	\$650	2012	\$799
Unnamed <sup>85</sup>	Paul Hastings	09 (2002)	\$630	2011	\$798
Erik Swanholt <sup>88</sup>	Greenberg Traurig	11 (1998)	\$575	2009	\$796
Unnamed <sup>92</sup>	Klee, Tuchin, Bogdanoff, & Stern	18 (1991)	\$590	2009	\$793
Unnamed <sup>85</sup>	Paul Hastings	08 (2003)	\$620	2011	\$785
Unnamed <sup>92</sup>	Weil, Gotschall & Manges	06 (2003)	\$580	2009	\$779
Suzanna Brickman <sup>83</sup>	MoFo	07 (2006)	\$650	2013	\$776
Unnamed <sup>92</sup>	Gibson Dunn & Crutcher	06 (2003)	\$570	2009	\$766
Allan Johnson <sup>90</sup>	O'Melveny & Myers	08 (2001)	\$565	2009	\$759
Unnamed <sup>85</sup>	Paul Hastings	07 (2004)	\$590	2011	\$747
Unnamed <sup>11</sup>	Arnold & Porter	09 (2004)	\$625	2013	\$746
Jennifer J. Johnson <sup>98</sup>	Fenwick & West	07 (2007)	\$640	2014	\$742
Unnamed <sup>92</sup>	Munger, Tolles & Olson	25 (1984)	\$550	2009	\$739
Unnamed <sup>84</sup>	Lieff Cabraser	14 (1998)	\$585	2012	\$719
Unnamed <sup>92</sup>	Pachulski, Stang et al.	14 (1995)	\$535	2009	\$719
Unnamed <sup>92</sup>	Morrison & Foerster	09 (2000)	\$535	2009	\$719
Unnamed <sup>85</sup>	Paul Hastings	06 (2005)	\$565	2011	\$716
Unnamed <sup>92</sup>	Gibson Dunn & Crutcher	15 (1994)	\$525	2009	\$706

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports</b>					
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Unnamed <sup>92</sup>	Munger, Tolles & Olson	12 (1997)	\$525	2009	\$706
Danielle Katziir <sup>86</sup>	Gibson Dunn	05 (2004)	\$525	2009	\$706
Glenn Peterson <sup>96</sup>	Millstone Peterson & Watts	18 (1996)	\$600	2014	\$696
Unnamed <sup>92</sup>	Hennigan, Bennett & Dorman	09 (2000)	\$505	2009	\$679
Unnamed <sup>92</sup>	Weil, Gotscahl & Manges	04 (2005)	\$500	2009	\$672
Unnamed <sup>85</sup>	Paul Hastings	05 (2006)	\$530	2011	\$671
Multiple associates <sup>86</sup>	Gibson Dunn	04 (2005)	\$495	2009	\$665
Dena G. Kaplan <sup>89</sup>	Irell & Manella	05 (2003)	\$475	2008	\$658
Kathleen Lu <sup>98</sup>	Fenwick & West	05 (2009)	\$560	2014	\$649
Unnamed <sup>84</sup>	Lieff Cabraser	11 (2001)	\$525	2012	\$646
Alex Doherty <sup>94</sup>	Sidley Austin	04 (2008)	\$520	2012	\$640
Katherine Eklund <sup>93</sup>	Milbank, Tweed	05 (2009)	\$550	2014	\$638
Unnamed <sup>85</sup>	Paul Hastings	04 (2007)	\$500	2011	\$633
Melissa Barshop <sup>86</sup>	Gibson Dunn	03 (2006)	\$470	2009	\$632
Unnamed <sup>92</sup>	Gibson Dunn & Crutcher	03 (2006)	\$470	2009	\$632
Unnamed <sup>92</sup>	Weil, Gotscahl & Manges	03 (2006)	\$465	2009	\$625



**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports</b>					
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Unnamed <sup>92</sup>	Munger, Tolles & Olson	04 (2005)	\$450	2009	\$605
Abby Schwartz <sup>90</sup>	O'Melveny & Myers	03 (2006)	\$450	2009	\$605
Unnamed <sup>92</sup>	Munger, Tolles & Olson	04 (2005)	\$435	2009	\$585
Anasara Purcell <sup>98</sup>	Fenwick & West	03 (2011)	\$505	2014	\$585
Lauren McCray <sup>94</sup>	Sidley Austin	02 (1998)	\$495	2014	\$574
Yungmoon Chang <sup>97</sup>		2 (2016)	\$554	2018	\$571
Unnamed <sup>85</sup>	Paul Hastings	03 (2008)	\$450	2011	\$570
Kimberly A. Svendsen <sup>89</sup>	Irell & Manella	04 (2004)	\$410	2008	\$568
Hirad Dadgostar <sup>88</sup>	Greenberg Traurig	03 (2006)	\$400	2008	\$554
Unnamed <sup>92</sup>	Munger, Tolles & Olson	03 (2006)	\$400	2009	\$538
Multiple associates <sup>86</sup>	Gibson Dunn	02 (2007)	\$400	2009	\$538
Unnamed <sup>84</sup>	Lieff Cabraser	06 (2006)	\$435	2012	\$535
Unnamed <sup>11</sup>	Quinn Emanuel		\$448	2013	\$535
Unnamed <sup>92</sup>	Munger, Tolles & Olson	04 (2004)	\$395	2009	\$531
Unnamed <sup>92</sup>	O'Melveny & Myers	03 (2006)	\$395	2009	\$531
Armen Nercessian <sup>98</sup>	Fenwick & West	02 (2012)	\$450	2014	\$522
Unnamed <sup>84</sup>	Lieff Cabraser	04 (2008)	\$395	2012	\$486

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

<b>Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports</b>					
<b>Atty</b>	<b>Firm</b>	<b>Practice Yrs [Grad Yr]</b>	<b>Rate</b>	<b>Year</b>	<b>Adjusted Rate</b>
Unnamed <sup>92</sup>	Weil, Gotscahl & Manges	01 (2008)	\$355	2009	\$477
Sara Brenner <sup>87</sup>	Quinn Emanuel	02 (2006)	\$340	2008	\$471
Bambo Obaro <sup>95</sup>	Weil Gotshal	04 (2010)	\$400	2014	\$464
Multiple associates <sup>86</sup>	Gibson Dunn	01 (2008)	\$345	2009	\$464
Unnamed <sup>85</sup>	Paul Hastings	01 (2010)	\$360	2011	\$456
Sr. Paralegal <sup>91</sup>	Paul Hastings		\$330	2010	\$431
Shannon K umagai <sup>98</sup>	Fenwick & West	01 (2014)	\$370	2014	\$429
Paralegal <sup>86</sup>	Gibson Dunn		\$315	2009	\$423
Lauren McCray <sup>94</sup>	Sidley Austin	01 (1998)	\$340	2012	\$418
Paralegal <sup>90</sup>	O'Melveny &Myers	17 (2004)	\$310	2009	\$417
Paralegal <sup>86</sup>	Gibson Dunn		\$300	2009	\$403
Sarah Victoria <sup>98</sup>	Fenwick & West	Paralegal	\$345	2014	\$400
Unnamed <sup>84</sup>	Lieff Cabraser	01 (2011)	\$325	2012	\$400
Paralegal <sup>86</sup>	Gibson Dunn		\$295	2009	\$396
Legal Assistant <sup>82</sup>	Skadden Arps		\$295	2011	\$374
Jessica Mohr <sup>95</sup>	Weil Gotshal	01 (2013)	\$300	2014	\$348
Keith Catuara <sup>97</sup>		Paralegal	\$334	2018	\$344
Robert Winant <sup>98</sup>	Fenwick & West	Paralegal	\$295	2014	\$342
David Tran <sup>98</sup>	Fenwick & West	ESI Support Staff	\$290	2014	\$336
Paralegal <sup>90</sup>	O'Melveny &Myers	12 (1997)	\$245	2009	\$329
Paralegal <sup>87</sup>	Quinn Emanuel		\$235	2008	\$325
Brad Bonnington <sup>98</sup>	Fenwick & West	ESI Support Staff	\$275	2014	\$319

**RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES**

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	Firm	Practice Yrs [Grad Yr]	Rate	Year	Adjusted Rate
Paralegal <sup>90</sup>	O'Melveny & Myers	05 (2004)	\$225	2009	\$302
Lisa Magee <sup>98</sup>	Fenwick & West	Paralegal	\$240	2014	\$278
Carol McCroy <sup>98</sup>	Fenwick & West	Paralegal	\$100	2014	\$116

## EXHIBIT C

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

BROOKSTONE HOLDINGS CORP., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 18-11780 (BLS)

Jointly Administered

Ref. Docket No. 1127

SUPPLEMENT TO SECOND INTERIM FEE APPLICATION OF  
GIBSON, DUNN & CRUTCHER LLP

Gibson, Dunn & Crutcher LLP (“Gibson Dunn” or the “Firm”), counsel to Brookstone Holdings Corp. and its affiliated debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the “Debtors”), hereby supplements the *Second Interim Fee Application of Gibson, Dunn & Crutcher LLP* [Docket No. 1127 (the “Second Interim Application”) for the period from November 1, 2018 through January 31, 2019 (the “Application Period”) by attaching, as Exhibits A through E hereto, certain schedules requested by the *Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under United States Code by Attorneys in Larger Chapter 11 Cases* (the “UST Guidelines”). In addition, Gibson Dunn respectfully states as follows to address the questions set forth under section C.5 of the UST Guidelines:

UST Guidelines C.5(b): Did you agree to any variation from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to

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<sup>1</sup> The Debtors, along with the last four digits of each Debtor’s tax identification number, are: Brookstone Holdings Corp. (4638), Brookstone, Inc. (2895), Brookstone Company, Inc. (3478), Brookstone Retail Puerto Rico, Inc. (5552), Brookstone International Holdings, Inc. (8382), Brookstone Purchasing, Inc. (2514), Brookstone Stores, Inc. (2513), Big Blue Audio LLC (N/A), Brookstone Holdings, Inc. (2515), and Brookstone Properties, Inc. (2517). The Debtors’ corporate headquarters and the mailing address for each Debtor is One Innovation Way, Merrimack, NH 03054.

this engagement that were provided during the application period?

If so, please explain.

Gibson Dunn Response: No. During the Application Period, Gibson Dunn did not agree to any variations from, or alternatives to, its standard or customary billing rates, fees, or terms.

UST Guidelines C.5(b): If the fees sought in the fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variations with the client?

Gibson Dunn Response: N/A. Gibson Dunn's fees did not exceed the budgeted amount by more than 10%.

UST Guidelines C.5(c): Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?

Gibson Dunn Response: No. The professionals included in the Second Interim Fee Application did not vary their hourly rate based on the geographic location of the bankruptcy case.

UST Guidelines C.5(d): Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does include reasonable fees preparing a fee application). If so, please quantify by hours and fees.



Gibson Dunn Response: No. The Second Interim Fee Application did not include any fees dedicated to revising time records or preparing and revising invoices that would not normally be compensable outside of bankruptcy.

UST Guidelines C.5(e): Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

Gibson Dunn Response: The time period covered by the Second Interim Fee Application includes approximately 102.3 hours with a value of \$63,919.00 spent by Gibson Dunn to ensure that the time entries subject to the Second Interim Fee Application comply with the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware and do not disclose privileged or confidential information. This review and any revisions associated therewith are a necessary component of Gibson Dunn's preparation of each monthly fee application.

UST Guidelines C.5(f): If the fee application includes any rate increase since retention: (i) Did your client review and approve those rate increases in advance?; (ii) Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458?

Gibson Dunn Response: The Second Interim Application includes rate increases since the effective date of the Court's approval of Gibson Dunn's retention. Such rate increases were the Firm's annual, standard rate increases, were approved by the client and were filed with the Court.

Dated: March 18, 2019  
New York, NY

/s/ Matthew J. Williams

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*Counsel to the Debtors and Debtors in Possession*

**EXHIBIT A**

**CUSTOMARY AND COMPARABLE  
COMPENSATION DISCLOSURES**

Gibson Dunn's hourly rates for bankruptcy services are comparable to the hourly rates charged in complex chapter 11 cases by comparably skilled bankruptcy attorneys. In addition, Gibson Dunn's hourly rates for bankruptcy services are comparable to the rates charged by Gibson Dunn, and by comparably skilled practitioners in other firms, for complex corporate and litigation matters, whether in court or otherwise, regardless of whether a fee application is required. By way of example, Gibson Dunn's blended hourly rates for attorneys and paraprofessionals for all Bankruptcy and Corporate Restructuring matters of Gibson Dunn for the prior calendar year were as set forth below. Gibson Dunn believes that the services performed for the Debtors are comparable to the services performed by the firm for all Bankruptcy and Corporate Restructuring matters during the prior calendar year. Also included below is blended hourly rate information for all sections of Gibson Dunn for which Gibson Dunn represented a client in a matter other than an in-court bankruptcy proceeding during the prior calendar year.<sup>1</sup>

Category of Timekeeper	Blended Hourly Rate		
	Billed Firm-wide non-bankruptcy and restructuring practice areas for preceding calendar year <sup>2</sup> (\$)	Billed Firm-wide bankruptcy and restructuring matters for preceding calendar year <sup>3</sup> (\$)	Billed This Application November 1, 2018 through January 31, 2019 (\$)
Partner	1,117	1,071	1021
Counsel	870	896	935
Associate	710	685	805
Paralegal	399	427	429
<b>Aggregated:</b>	820	835	896

<sup>1</sup> While Gibson Dunn used reasonable efforts to separate Bankruptcy and Restructuring matters from other practice group matters, it is possible that there is some overlap between these practice groups and the billings reported herein.

<sup>2</sup> This column reflects the blended rates charged by the firm for all matters excluding Bankruptcy and Corporate restructuring matters during the prior calendar year.

<sup>3</sup> This column reflects the blended rates charge by the firm for all Bankruptcy and Corporate Restructuring matters during the prior calendar year.

**EXHIBIT B**

**SUMMARY OF TIMEKEEPERS INCLUDED IN THE  
SECOND INTERIM APPLICATION**

	Name	Title	Department	Date of Admission	2018 Hourly Billing Rate (\$)	2019 Hourly Billing Rate (\$)	Total Billed Hours for this Application Period	Fees Billed in the Application Period (\$)
1.	Karlan, Mitchell	Partner	Litigation	1980	1415	1495	12.00	17,500.00
2.	Feldman, David	Partner	Corporate	1994	1260	1345	2.20	2,772.00
3.	Rosenauer, David	Partner	Tax	1993	1260	1345	10.60	13,356.00
4.	Winter, Graham	Partner	Corporate	1990	1260	1345	0.60	756.00
5.	Williams, Matt	Partner	Bankruptcy	1999	1215	1285	49.70	61,176.50
6.	Collins, Michael	Partner	Litigation	2005	1205	1265	2.60	3,157.00
7.	Hoffman, Matthew	Partner	Corporate	2003	1155	1195	3.50	4,042.50
8.	Kelsey, Matthew K.	Partner	Bankruptcy	2004	1085	1115	133.20	145,419.00
9.	Leroy, Carrie	Partner	Litigation	2000	1025	1075	4.20	4,305.00
10.	Martorana, Keith	Partner	Bankruptcy	2008	935	1095	331.40	325,523.00
11.	Vojtisek, John-Paul	Of Counsel	Corporate	2006	935	995	26.50	24,843.50
12.	Fortney, Jonathan	Associate	Litigation	2010	925	975	24.50	23,447.50
13.	Goldstein, Jason	Associate	Bankruptcy	2013	885	945	400.90	362,788.50
14.	Weiner, Genevieve	Associate	Bankruptcy	2007	875	915	28.30	25,138.50
15.	Riddick, Tarana	Associate	Litigation	2015	815	895	30.40	27,208.00
16.	Bouslog, Matthew	Associate	Bankruptcy	2011	840	900	1.00	840.00
17.	Solow, Ryan	Associate	Corporate	2011	840	900	0.30	252.00
18.	Cassidy, Dylan S.	Associate	Corporate	2016	755	850	173.10	135,526.00
19.	Park, Jean	Associate	Corporate	2014	720	815	3.00	2,160.00
20.	Schmeltz, Brittany	Associate	Corporate	2016	595	695	2.30	1,368.50
21.	Bernstein, Andrew	Associate	Corporate	2016	615	725	16.30	11,080.50
22.	Hammond, Tyler A.*	Associate	Corporate		545	625	85.00	48,373.00
23.	Ogowewo, Imole	Paralegal	Corporate		495	515	0.50	247.50
24.	Kann, Stephanie	Paralegal	Corporate		470	490	4.80	2,256.00
25.	Amponsah, Duke	Paralegal	Bankruptcy		440	460	17.20	7,634.00
26.	Santos, Pamela	Paralegal	Bankruptcy		420	435	61.30	26,049.00



	Name	Title	Department	Date of Admission	2018 Hourly Billing Rate (\$)	2019 Hourly Billing Rate (\$)	Total Billed Hours for this Application Period	Fees Billed in the Application Period (\$)
27.	Yang, Eric	Paralegal	Corporate		395		0.20	79.00
	Total						1,425.60	1,277,298.50

\*NY State Bar number pending; not currently licensed to practice in the State of New York.

**EXHIBIT C**

**BUDGET AND STAFFING PLAN**

**November Estimated Budget & Staffing Plan**

Timekeeper	Position	Projected Hours In October	2018 Rate	Monthly Projected Fees
David Rosenauer	Partner	30	\$ 1,260.00	\$ 37,800.00
Matt Williams	Partner	30	\$ 1,215.00	\$ 36,450.00
Michael Collins	Partner	20	\$ 1,205.00	\$ 24,100.00
Matthew Kelsey	Partner	175	\$ 1,085.00	\$ 189,875.00
Keith Martorana	Of Counsel	175	\$ 935.00	\$ 163,625.00
John-Paul Vojtisek	Of Counsel	40	\$ 935.00	\$ 37,400.00
Jason Goldstein	Associate	175	\$ 885.00	\$ 154,875.00
Genevieve Weiner	Associate	30	\$ 875.00	\$ 26,250.00
Dylan Cassidy	Associate	175	\$ 755.00	\$ 132,125.00
Brittany Schmeltz	Associate	10	\$ 595.00	\$ 5,950.00
Tyler Hammond	Associate	75	\$ 545.00	\$ 40,875.00
Duke Amponsah	Paralegal	30	\$ 440.00	\$ 13,200.00
Pam Santos	Paralegal	30	\$ 420.00	\$ 12,600.00
<b>Projected Fees for November</b>				<b>\$ 875,125.00</b>
<b>Projected Costs for November</b>				<b>\$ 25,000.00</b>
<b>Projected Fees &amp; Costs for November</b>				<b>\$ 900,125.00</b>

**December Estimated Budget & Staffing Plan**

Timekeeper	Position	Projected Hours In December	2018 Rate	Monthly Projected Fees
David Rosenauer	Partner	20	\$ 1,260.00	\$ 25,200.00
Matt Williams	Partner	30	\$ 1,215.00	\$ 36,450.00
Michael Collins	Partner	10	\$ 1,205.00	\$ 12,050.00
Matthew Kelsey	Partner	125	\$ 1,085.00	\$ 135,625.00
Keith Martorana	Of Counsel	150	\$ 935.00	\$ 140,250.00
John-Paul Vojtisek	Of Counsel	40	\$ 935.00	\$ 37,400.00
Jason Goldstein	Associate	175	\$ 885.00	\$ 154,875.00
Genevieve Weiner	Associate	30	\$ 875.00	\$ 26,250.00
Dylan Cassidy	Associate	175	\$ 755.00	\$ 132,125.00
Brittany Schmeltz	Associate	10	\$ 595.00	\$ 5,950.00
Tyler Hammond	Associate	100	\$ 545.00	\$ 54,500.00
Duke Amponsah	Paralegal	30	\$ 440.00	\$ 13,200.00
Pam Santos	Paralegal	30	\$ 420.00	\$ 12,600.00
<b>Projected Fees for December</b>				<b>\$ 786,475.00</b>
<b>Projected Costs for December</b>				<b>\$ 25,000.00</b>
<b>Projected Fees &amp; Costs for December</b>				<b>\$ 811,475.00</b>

**January Estimated Budget & Staffing Plan**

Timekeeper	Position	Projected Hours In January	2019 Rate	Monthly Projected Fees
David Rosenauer	Partner	10	\$ 1,345.00	\$ 13,450.00
Matt Williams	Partner	10	\$ 1,285.00	\$ 12,850.00
Michael Collins	Partner	10	\$ 1,265.00	\$ 12,650.00
Matthew Kelsey	Partner	75	\$ 1,115.00	\$ 83,625.00
Keith Martorana	Partner	100	\$ 1,095.00	\$ 109,500.00
John-Paul Vojtisek	Of Counsel	20	\$ 995.00	\$ 19,900.00
Jason Goldstein	Associate	125	\$ 945.00	\$ 118,125.00
Genevieve Weiner	Associate	30	\$ 915.00	\$ 27,450.00
Dylan Cassidy	Associate	125	\$ 850.00	\$ 106,250.00
Tyler Hammond	Associate	100	\$ 625.00	\$ 62,500.00
Duke Amponsah	Paralegal	30	\$ 460.00	\$ 13,800.00
Pam Santos	Paralegal	30	\$ 435.00	\$ 13,050.00
<b>Projected Fees for January</b>				<b>\$ 593,150.00</b>
<b>Projected Costs for January</b>				<b>\$ 25,000.00</b>
<b>Projected Fees &amp; Costs for January</b>				<b>\$ 618,150.00</b>

PROFESSIONAL	POSITION OF PROFESSIONAL; NUMBER OF YEARS IN THAT POSITION; YEAR OBTAINING LICENSE TO PRACTICE, IF APPLICABLE
Karlan, Mitchell	Partner since 1989. Joined the firm as an Associate in 1984. Member of the D.C. Bar since 2005; NY bar since 1980. Primary practice area: General Commercial Litigation
Feldman, David	Partner. Joined firm as a Partner in 2008. Member of NY Bar since 1994. Primary practice area: Business Restructuring & Reorganization
Rosenauer, David	Partner. Joined firm as an Associate in 1987. Member of NY Bar since 1993. Primary practice area: Tax
Winter, Graham	Partner. Joined firm as a Partner in 2011. Licensed to practice law in Hong Kong since 2016; United Kingdom since 1990. Primary practice area: Capital Markets; Mergers and Acquisitions; Private Equity; Securities Regulation and Corporate Governance
Williams, Matt	Partner. Joined the firm as a Partner in 2008. Member of NY Bar since 1999. Primary practice area: Business Restructuring and Reorganization
Collins, Michael	Partner since 2007. Joined firm as an Associate in 2000. Member of D.C. Bar since 2004. Primary practice area: Executive Compensation and Employee Benefits
Hoffman, Matthew	Partner since 2012. Joined Firm as an Associate in 2003. Member of CA Bar since 2003. Primary practice area: Insurance
Kelsey, Matthew K.	Partner since 2013. Joined Firm as an Of Counsel in 2008. Member of NY Bar since 2004. Primary practice area: Business Restructuring & Reorganization
Leroy, Carrie	Partner since 2018. Joined Firm as a Partner in 2018. Member of CA Bar since 2000. Primary practice area: Intellectual Property
Martorana, Keith	Of Counsel. Joined the firm as an Associate in 2008. Member of the NY and NJ Bars since 2008.
Vojtisek, John-Paul	Of Counsel. Joined the firm as an Associate in 2005. Member of the NY Bar since 2006.
Fortney, Jonathan	Associate. Joined the Firm as an Associate in 2009. Member of NY Bar since 2010.



PROFESSIONAL	POSITION OF PROFESSIONAL; NUMBER OF YEARS IN THAT POSITION; YEAR OBTAINING LICENSE TO PRACTICE, IF APPLICABLE
Goldstein, Jason	Associate. Joined the firm as an Associate in 2016. Member of the NY Bar since 2013.
Weiner, Genevieve	Associate. Joined the Firm as an Associate in 2007. Member of CA Bar since 2007.
Riddick, Tarana	Associate. Joined the Firm as an Associate in 2014. Member of NY Bar since 2015.
Bouslog, Matthew	Associate. Joined firm as an Associate in 2012. Member of CA Bar since 2011.
Solow, Ryan	Associate. Joined the firm as an Associate in 2015. Member of CA Bar since 2015; IL Bar since 2011.
Cassidy, Dylan S.	Associate. Joined the Firm as an Associate in 2015. Member of NY Bar since 2016.
Park, Jean	Associate. Joined the firm as an Associate in 2014. Member of CA Bar since 2014.
Schmeltz, Brittany	Associate. Joined the firm as an associate in 2016. Member of CA Bar since 2016.
Bernstein, Andrew	Associate. Joined the firm as an Associate in 2018. Member of NY Bar since 2018.
Hammond, Tyler A.*	Associate. Joined the Firm as an Associate in 2018. *NY State Bar number pending; not currently licensed to practice in the State of New York.
Ogowewo, Imole	Paralegal
Kann, Stephanie	Paralegal
Amponsah, Duke	Paralegal
Santos, Pamela	Paralegal
Yang, Eric	Paralegal

**EXHIBIT D**

**SUMMARY OF COMPENSATION AND EXPENSE REIMBURSEMENT**

<b>SUMMARY OF COMPENSATION BY PROJECT CATEGORY</b>		
<b>Project Category</b>	<b>Hours Billed</b>	<b>Fees Sought(\$)</b>
Asset Recovery Analysis	31.00	27,252.00
Asset Sales	121.20	112,920.50
Asset Valuation	0.00	0.00
Assumption and Rejection of Leases and Contracts	103.30	85,508.00
Budgeting	3.90	3,483.50
Business Operations	53.50	49,500.50
Case Administration	90.50	80,756.00
Claims Administration	197.00	189,587.00
Corporate Governance and Board Matters	31.30	31,998.50
Communications and Meetings with Creditors	9.90	8,156.00
Employee Matters and Benefits	37.80	30,509.00
Employment and Fee Applications (Gibson)	102.30	63,919.00
Employment and Fee Applications (Other Professionals)	7.30	6,838.50
Financing, Cash Collateral and Cash Management	0.60	531.00
Hearings	0.00	0.00
Insurance	11.80	11,860.00
Litigation	5.50	6,120.50
Plan and Disclosure Statement	567.30	516,781.00
Plan Exclusivity	4.90	4,695.50
Real Estate	0.30	252.00
Relief from Stay and Adequate Protection	1.40	1,194.00
Reporting	5.80	5,473.00
Tax	39.00	39,963.00
Travel – Non-Working Time	0.00	0.00
<b>TOTAL</b>	<b>1,425.60</b>	<b>1,277,298.50</b>

SUMMARY OF EXPENSE REIMBURSEMENT BY CATEGORY	
Category	Amount (\$)
Certified Copies	0.00
Computer Services	0.00
Conference Call Charges	179.20
Court Fees	0.00
Data Line Charges	0.00
Document Retrieval Services	136.50
eDocument Retrieval Services	1,121.99
Filing Fees	8,142.00
In House Duplication	100.10
Investigation	0.00
Lodging	0.00
Meals	0.00
Messenger and Courier Expense	37.82
On-Line Research (Westlaw)	13,504.42
Other – Consultant	2,800.00
Outside Process Server	75.00
Searches (UCC & Others)	0.00
Specialized Research	932.10
Telephone Charges	204.06
Transcript / Digesting	1,562.37
Travel – Air & Rail	0.00
Travel – Taxi & Other Modes/Miles	1,539.10
<b>TOTAL</b>	<b>30,334.66</b>

**EXHIBIT E**

**SECOND INTERIM APPLICATION SUMMARY**

SUMMARY OF SECOND INTERIM APPLICATION	
Name of Applicant	Gibson, Dunn & Crutcher LLP
Name of Client	Debtors and Debtors-in-Possession
Time period covered by Second Interim Application	November 1, 2018 through January 31, 2019
Total compensation sought during the Application Period	\$1,277,298.50
Total expenses sought during the Application Period	\$30,334.66
Petition Date	August 2, 2018
Retention Date	August 2, 2018 (order entered March 24, 2018 <i>nunc pro tunc</i> to August 2, 2018)
Date of order approving employment	March 24, 2018
Total compensation approved by interim order to date	\$4,091,343.50
Total expenses approved by interim order to date	\$111,073.60
Total allowed compensation paid to date	\$4,091,343.50
Total allowed expenses paid to date	\$111,073.60
Blended rate in the Second Interim Application for all <i>attorneys</i>	\$925.04
Blended rate in the Second Interim Application for all <i>timekeepers</i>	\$895.97
<i>Compensation</i> sought in the Second Interim Application already <i>paid</i> pursuant to a monthly compensation order but not yet allowed	\$685,920.40
<i>Expenses</i> sought in the Second Interim Application already <i>paid</i> pursuant to a monthly compensation order but not yet allowed	\$23,907.87
Number of professionals included in the Second Interim Application	27
If applicable, number of professionals in the Second Interim Application not included in staffing plan approved by client	14
If applicable, difference between fees budgeted and compensation sought during the Application Period	Amt. Budgeted: \$2,329,750.00 Amt. Sought: \$1,307,633.16
Number of professionals billing fewer than 15 hours to the case during the Application Period	14
Are any rates higher than those approved or disclosed at retention?	Yes <sup>5</sup>

<sup>5</sup> Gibson Dunn filed a *Supplemental Declaration of Matthew J. Williams in Support of Debtors' Application for an Order Approving the Employment and Retention of Gibson, Dunn & Crutcher LLP as General Bankruptcy and Restructuring Counsel for the Debtors and Debtors in Possession nunc pro tunc to the Petition Date*, [D.I. 922] on December 19, 2018 in which it provided notice of Gibson Dunn's 2019 hourly billing rates.